

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

ALPHA PHI ALPHA FRATERNITY  
INC., a nonprofit organization on behalf  
of members residing in Georgia; SIXTH  
DISTRICT OF THE AFRICAN  
METHODIST EPISCOPAL CHURCH,  
a Georgia nonprofit organization; ERIC  
T. WOODS; KATIE BAILEY GLENN;  
PHIL BROWN; JANICE STEWART,

**Case No. 1:21-cv-5337**

*Plaintiffs,*

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State of  
Georgia.

*Defendant.*

**PLAINTIFFS' NOTICE REGARDING OBJECTIONS  
TO DEFENDANT'S WITNESSES**

Pursuant to the Court's Coordinated Order, Dkt. 66 directing the parties to file objections to witnesses and exhibits by 5:00 p.m. on February 2, 2022, the Alpha Plaintiffs object to, and are simultaneously with the filing of this notice, moving to exclude Defendant's recently disclosed expert witnesses Ms. Lynn Bailey, Ms. Gina Wright, and Dr. John Alford. Plaintiffs preserve all objections to these witnesses on the additional grounds of relevance and foundation.

Dated: February 2, 2022.

Respectfully submitted,

/s/ Rahul Garabadu

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

*/s/ Rahul Garabadu*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served the foregoing *Plaintiffs' Notice Regarding Objections To Defendant's Witnesses* with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel or parties of record on the service list:

This 2nd day of February, 2022.

/s/ Rahul Garabadu