

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

FAIR FIGHT, INC., SCOTT BERSON,  
JOCELYN HEREDIA, and JANE  
DOE,

Plaintiffs,

v.

TRUE THE VOTE, INC., CATHERINE  
ENGELBRECHT, DEREK  
SOMERVILLE, MARK DAVIS,  
MARK WILLIAMS, RON JOHNSON,  
JAMES COOPER, and JOHN DOES 1-  
10,

Defendants.

Civil Action No.  
2:20-cv-00302-SCJ

**PLAINTIFFS' NOTICE OF ERRATA**

Plaintiffs submit this Notice of Errata to correct certain citations to deposition transcripts in the Statement of Material Facts submitted with their Motion for Summary Judgment. *See* ECF 156-2. In these instances, Plaintiffs' Statement of Material Facts mistakenly cited to non-final deposition transcripts, which resulted in an approximately five-page discrepancy between the provided citation and the correct citation. Plaintiffs also seek to correct missing citations in paragraphs 72 and 80 of their Statement of Material Facts. The following corrections have been made:

<b>Paragraph</b>	<b>Original Citation</b>	<b>Corrected Citation</b>
77	Somerville II Tr. 88:17-89:13	Somerville II Tr. 94:11-95:2
85	OPSEC/Phillips Tr. 136:14-16	OPSEC/Phillips Tr. 141:17-19
96	OPSEC/Phillips Tr. 140:14-22	OPSEC/Phillips Tr. 146:2-5
97	OPSEC/Phillips Tr. 120:22-121:2	OPSEC/Phillips Tr. 125:12-22
105	OPSEC/Phillips Tr. 120:14-20	OPSEC/Phillips Tr. 125:12-18
107	OPSEC/Phillips Tr. 126:2-11	OPSEC/Phillips Tr. 131:7-12
107	OPSEC/Phillips 126:12-15	OPSEC/Phillips Tr. 131:13-16
108	OPSEC/Phillips Tr. 120:14-21	OPSEC/Phillips Tr. 125:12-19

Additionally, two citations were incomplete and have been corrected as follows:

<b>Paragraph</b>	<b>Corrected Citation</b>
72	TTV/Engelbrecht Tr. 158:1-159:5; Ex. 28, Email from M. Williams to A. Holsworth
80	<i>See infra</i> ¶¶ 81-111

[SIGNATURE BLOCK ON NEXT PAGE]

Respectfully submitted, this 24th day of May, 2022.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the within and foregoing *Plaintiffs' Notice of Errata* with the Clerk of Court using the CM/ECF system, which will automatically send-e-mail notification to all counsel of record.

This 24th day of May, 2022.

/s/ Uzoma Nkwonta

Uzoma Nkwonta  
*Counsel for Plaintiffs*

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