

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

MICHAEL J. DAUGHERTY,  
CONTESTANT,

v.

CIVIL ACTION NO.: 2021CV344953

FULTON COUNTY REGISTRATION  
AND ELECTION BOARD et al.,  
DEFENDANTS.

MOTION TO AMEND PETITION ENTERED ON 01/25/2021

COMES NOW, THE CONTESTANT, by and through his undersigned attorney, to moves the Court pursuant to Ga. Code Ann. § 21-2-524 (g) to allow an amendment to the original petition that was entered on 01/25/2021, as follows:

1.

The Contestant had his original petition entered of record on 01/25/2021.

2.

The Contestant seeks to amend his original petition to strike in its entirety paragraph 3 (a), in Count 3, on Page 13. (Exhibit "A").

WHEREFORE, THE CONTESTANT prays:

- a). that the Court **GRANTS** this motion to amend without a hearing pursuant to USCR 6.1;
- b). that the Court **ORDERS** the Contestant to file his amendment within two (2) days of the entry of an order; **AND**
- c). for any other relief the Court **DEEMS** just and proper.

Respectfully submitted this the 7<sup>th</sup> day of February, 2021.

**MADDOX & HARDING, LLC**



Todd A. Harding, For the Firm  
Ga. Bar No.: 101562  
Attorney for Contestant

Maddox & Harding, LLC  
Attorneys at Law  
113 E. Solomon Street  
Griffin, GA 30223  
770-229-4578  
770-228-9111 facsimile

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

**MICHAEL J. DAUGHERTY,  
CONTESTANT,**

**v.**

**CIVIL ACTION NO.: 2021CV344953**

**FULTON COUNTY REGISTRATION  
AND ELECTION BOARD,  
DEKALB COUNTY REGISTRATION  
AND ELECTION BOARD, COFFEE  
COUNTY BOARD OF REGISTRATION  
AND ELECTIONS, GEORGIA STATE  
ELECTIONS BOARD, BRAD RAFFENSPERGER,  
IN HIS OFFICIAL CAPACITY AS SECRETARY  
OF STATE, RAPHAEL G.  
WARNOCK, AND THOMAS  
JONATHAN OSSOFF,  
DEFENDANTS.**

**CERTIFICATE OF SERVICE**

**COMES NOW, THE CONTESTANT**, by and through his attorney of record,  
and certifies that a true and accurate copy of the **MOTION TO AMEND PETITION**  
**ENTERED ON 01/25/2021** has been served by U.S. Mail upon:

Sec. Brad Raffensperger, As Chairman of the Georgia State Elections Board  
214 State Capitol  
Atlanta, GA 30334

Sec. Brad Raffensperger, As Georgia Secretary of State  
214 State Capitol  
Atlanta, GA 30334

Fulton County Registration and Elections Board  
130 Peachtree Street  
Suite 2186  
Atlanta, GA 30303

Dekalb County Registration and Elections Board  
4380 Memorial Drive, #300  
Decatur, GA 30032

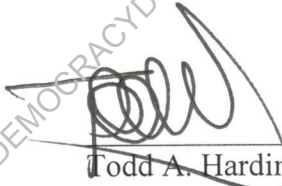
Coffee County Registration and Elections Board  
224 W. Ashley Street  
Douglas, GA 31533-2340

Thomas Jonathan Ossoff  
825 B & C Hart Building  
Washington, D.C. 20510

Raphael G. Warnock  
B40 Dirksen Senate Building  
Washington, D.C. 20510

Respectfully submitted this the 7<sup>th</sup> day of February, 2021.

**MADDOX & HARDING, LLC**



Todd A. Harding, For the Firm  
Ga. Bar No.: 101562  
Attorney for Contestant

Maddox & Harding, LLC  
Attorneys at Law  
113 E. Solomon Street  
Griffin, GA 30223  
(770) 229-4578  
(770) 228-9111 facsimile

# EXHIBIT “A”

RETRIEVED FROM DEMOCRACYDOCKET.COM

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

**MICHAEL J. DAUGHERTY,  
CONTESTANT,**

**v.**

**CIVIL ACTION NO.: 2021CV344953**

**FULTON COUNTY REGISTRATION  
AND ELECTION BOARD et al.,  
DEFENDANTS.**

**CONTESTANT'S 1<sup>st</sup> AMENDMENT TO PETITION FOR ELECTION CONTEST**

**COMES NOW, THE CONTESTANT**, by and through his undersigned attorney, to amend his original petition pursuant to Ga. Code Ann. § 21-2-524 (g), as follows:

19.

The Contestant amends his original petition by striking in its entirety paragraph 3 (a), in Count 3, on Page 13 from the original petition. (Exhibit "A")

**WHEREFORE, THE CONTESTANT** prays:

- a). that process **ISSUES** and service be **EFFECTUATED**;
- b). that the Court **CONDUCTS** a trial by jury pursuant to Ga. Code Ann. § 21-2-526 on all issues triable before a jury;
- c). that the Court **DECLARES** that Defendant Thomas Jonathan Ossoff was ineligible to be a candidate in the 01/05/2021 Georgia Senate Runoff Election against David Purdue;
- d). that the Court **DECLARES** that the results of the 01/05/2021 Runoff Election are invalid, as a matter of law;
- e). that the Court **ORDERS** that a second election be had within forty-five (45) days of the entry of this order;
- f). that the Court **ISSUES** a permanent injunction preventing the use of Dominion voting machines by the Defendants in all future elections had after the entry of this order;
- g). that the Court **ORDERS** the Defendants to allow the Contestant and his representatives immediate access to all mail-in paper ballots from the November 3, 2020 General Election for visual inspection;

- h). that the Court **ORDERS** that the Defendants allow the Contestant and his representatives to immediately scan all mail-in paper ballots from the November 3, 2020 General Election for technical inspection and validation;
- i). that the Court **ORDERS** the Defendants to make available and, as requested, produce the existing Dominion ballot images and election reports from the 11/03/2020 General Election for technical inspection and validation;
- j). that the Court **ORDERS** the Respondents to allow a physical and forensic review of all Dominion voting machines, as requested, in the November 2020 General Election and January 05, 2021 continuation in a manner consistent with the integrity of the equipment; **AND**
- k). for any other relief the Court **DEEMS** just and proper.

Respectfully submitted this the 7<sup>th</sup> day of February, 2021.

**MADDOX & HARDING, LLC**

A handwritten signature in black ink, appearing to read 'Todd A. Harding', is written over a horizontal line.

Todd A. Harding, For the Firm  
Ga. Bar No.: 101562  
Attorney for Contestant

Maddox & Harding, LLC  
Attorneys at Law  
113 E. Solomon Street  
Griffin, GA 30223  
770-229-4578  
770-228-9111 facsimile



**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

**MICHAEL J. DAUGHERTY,  
CONTESTANT,**

**v.**

**CIVIL ACTION NO.: 2021CV344953**

**FULTON COUNTY REGISTRATION  
AND ELECTION BOARD,  
DEKALB COUNTY REGISTRATION  
AND ELECTION BOARD, COFFEE  
COUNTY BOARD OF REGISTRATION  
AND ELECTIONS, GEORGIA STATE  
ELECTIONS BOARD, BRAD RAFFENSPERGER,  
IN HIS OFFICIAL CAPACITY AS SECRETARY  
OF STATE, RAPHAEL G.  
WARNOCK, AND THOMAS  
JONATHAN OSSOFF,  
DEFENDANTS.**

**CERTIFICATE OF SERVICE**

**COMES NOW, THE CONTESTANT**, by and through his attorney of record,  
and certifies that a true and accurate copy of the **CONTESTANT'S 1<sup>st</sup> AMENDMENT  
TO PETITION FOR ELECTION CONTEST** has been served by U.S. Mail upon:

Sec. Brad Raffensperger, As Chairman of the Georgia State Elections Board  
214 State Capitol  
Atlanta, GA 30334

Sec. Brad Raffensperger, As Georgia Secretary of State  
214 State Capitol  
Atlanta, GA 30334

Fulton County Registration and Elections Board  
130 Peachtree Street  
Suite 2186  
Atlanta, GA 30303

Dekalb County Registration and Elections Board  
4380 Memorial Drive, #300  
Decatur, GA 30032

Coffee County Registration and Elections Board  
224 W. Ashley Street  
Douglas, GA 31533-2340

Thomas Jonathan Ossoff  
825 B & C Hart Building  
Washington, D.C. 20510

Raphael G. Warnock  
B40 Dirksen Senate Building  
Washington, D.C. 20510

Respectfully submitted this the 7<sup>th</sup> day of February, 2021.

**MADDOX & HARDING, LLC**

A handwritten signature in black ink, appearing to read "Todd A. Harding", is written over a horizontal line. The signature is stylized with loops and a long horizontal stroke extending to the left.

Todd A. Harding, For the Firm  
Ga. Bar No.: 101562  
Attorney for Contestant

Maddox & Harding, LLC  
Attorneys at Law  
113 E. Solomon Street  
Griffin, GA 30223  
(770) 229-4578  
(770) 228-9111 facsimile