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

VOTEAMERICA, et al.,

Plaintiffs,

v.

Civil Action No.: 1:21-CV-1390-JPB

BRAD RAFFENSPERGER, in his official capacity as the Secretary of State for the State of Georgia, *et al.*,

Defendants,

REPUBLICAN NATIONAL COMMITTEE, et al.,

Intervenor-Defendants.

STATE DEFENDANTS' RENEWED MOTION TO EXCLUDE THE TESTIMONY AND OPINIONS OF PLAINTIFFS' EXPERT DONALD P. GREEN, PHD

Pursuant to Federal Rule of Evidence 702, the State Defendants hereby file this renewed motion to exclude the testimony and expert opinions of Plaintiffs' expert, Donald P. Green, PhD. See Doc. 179 at 39 n.23. State Defendants have also filed a brief in support of this motion.

Respectfully submitted this 22nd day of December, 2023.

Christopher M. Carr Attorney General Georgia Bar No. 112505 Bryan K. Webb Deputy Attorney General Georgia Bar No. 743580 Russell D. Willard Senior Assistant Attorney General Georgia Bar No. 760280 **State Law Department** 40 Capitol Square, S.W. Atlanta, Georgia 30334

/s/ Gene C. Schaerr

Gene C. Schaerr*
Special Assistant Attorney General
Erik Jaffe*
H. Christopher Bartolomucci*
Brian J. Field*
Edward H. Trent*
SCHAERR | JAFFE LLP
1717 K Street NW, Suite 900
Washington, DC 20006
Telephone: (202) 787-1060
Fax: (202) 776-0136
gschaerr@schaerr-jaffe.com

*Admitted pro hac vice

Bryan P. Tyson
Special Assistant Attorney General
Georgia Bar No. 515411
btyson@taylorenglish.com
Bryan F. Jacoutot
Georgia Bar No. 668272
bjacoutot@taylorenglish.com
Diane Festin LaRoss
Georgia Bar No. 430830
dlaross@taylorenglish.com
Taylor English Duma LLP

1600 Parkwood Circle Suite 200 Atlanta, GA 30339 Telephone: (678) 336-7249

Counsel for State Defendants

CERTIFICATE OF COMPLIANCE

Under L.R. 7.1(D), the undersigned hereby certifies that the foregoing State Defendants' Renewed Motion to Exclude the Testimony and Opinions of Plaintiffs' Expert, Donald P. Green, PhD, has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(C).

<u>/s/Gene C. Schaerr</u> Gene C. Schaerr

PAETRIENED FROM DEINOCRACYDOCKET. COM