

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

IN RE GEORGIA SENATE BILL 202

Master Case No.  
1:21-MI-55555-JPB

**JOINT STATUS REPORT**

The United States and the State Defendants submit this joint status report pursuant to the Court's July 12, 2022, order. Dkt. No. 208. Counsel for the United States and the State Defendants met by telephone conference on July 14 to discuss the scope and mechanics of the State's production of data in response to Request for Production # 6. The State is gathering information from the Department of Driver Services (DDS) about which fields in the DDS database would be responsive to RFP # 6. The parties will meet again on Tuesday July 19, including staff with technical expertise and familiarity with the database to assist the parties in refining the parameters of the data export. The parties are also discussing security procedures related to storage and use of the data.

With respect to timing, the State is currently unable to provide a specific estimate of when it will be able to produce the data. Rather, as counsel for the State explained during the parties' telephone conference, the timing of production will depend in part on the scope of the data that must be compiled and produced.

Given the length of time this discovery request has been pending, and upcoming deadlines for expert reports, the United States is very concerned about further delay in the production of DDS data. The State notes in response that it has been actively engaged in the meet and confer process about this issue and, had the United States agreed to allow DDS to perform the matching, the United States would have already received all the information it purports to need to determine DDS ID status for all registered voters. But, as the State has explained repeatedly, requiring the State to compile and produce the data will take time. Indeed, while a precise estimate is not yet possible, it may take weeks, rather than days. The DDS database is 57 terabytes in size, spanning more than 12,000 tables. Developing a script to identify and compile the information that the United States demands is time consuming. However, the State will be able to provide a more concrete estimate of the time needed after the parties confer further about what data DDS must compile. The State is committed to continue discussing this matter with the United States in good faith and working as expeditiously as possible toward resolution.

Accordingly, the parties propose that they file a second joint status report by Monday July 25, updating the Court on the status of this matter.

Date: July 18, 2022

Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(D)**

Pursuant to Local Rule 7.1(D), I certify that the foregoing document was prepared in Times New Roman 14-point font in compliance with Local Rule 5.1(C).

/s/ Elizabeth M. Ryan  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2022, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Elizabeth M. Ryan  
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