

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 19, 2022, order. *See* Docket Entry dated July 19, 2022. Counsel for the United States, counsel for the State Defendants, and several staff from the Department of Driver Services (DDS) met by telephone conference on July 19 to discuss further the scope and mechanics of the State's production of data in response to Request for Production # 6. On July 22, the State provided the United States with a proposed list of fields they intend to produce from the DDS databases. The State anticipates producing the files from the DDS databases to the United States by August 5, 2022.

The State has requested a protective order regarding the DDS data, separate from the protective order already entered in this case (*see* Dkt. No. 106, Order Granting Mot. for Protective Order, Feb. 22, 2022). The parties expect to file a motion for entry of a proposed protective order specific to the DDS data with the Court by August 1, 2022.

Date: July 25, 2022

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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/ Maura Eileen O'Connor

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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 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/ Maura Eileen O'Connor

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