

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

AMERICAN COUNCIL OF THE)	
BLIND OF INDIANA, et. al,)	
)	
Plaintiffs,)	
)	
v.)	No. 1:20-cv-3118-JMS-MJD
)	
INDIANA ELECTION COMMISSION,)	
et. al.)	
)	
Defendants.)	

DEFENDANTS’ FINAL WITNESS AND EXHIBIT LIST

Defendants, by counsel, in accord with the Court’s amended case management plan, provide the following final witness and exhibit list:

Final Witness List

1. J. Bradley King, defendant and Co-Director of the Indiana Election Division: to testify about the allegations in the lawsuit, election procedures, efforts to implement SEA 398, and other efforts to provide absentee voting options to print-disabled voters
2. Angela Nussmeyer, defendant and Co-Director of the Indiana Election Division: to testify about the allegations in the lawsuit, election procedures, efforts to implement SEA 398, and other efforts to provide absentee voting options to print-disabled voters
3. Paul Okeson, defendant and Chair of the Indiana Election Commission: to testify about the allegations in the lawsuit, election procedures, efforts to implement

SEA 398, and other efforts to provide absentee voting options to print-disabled voters

4. Suzannah Wilson Overholt, defendant and Vice-Chair of the Indiana Election Commission: to testify about the allegations in the lawsuit, election procedures, efforts to implement SEA 398, and other efforts to provide absentee voting options to print-disabled voters
5. Litany A. Pyle, defendant and Member of the Indiana Election Commission: to testify about the allegations in the lawsuit, election procedures, efforts to implement SEA 398, and other efforts to provide absentee voting options to print-disabled voters
6. Karen Celestino-Horseman, defendant and Member of the Indiana Election Commission: to testify about the allegations in the lawsuit, election procedures, efforts to implement SEA 398, and other efforts to provide absentee voting options to print-disabled voters
7. Jay Phelps, Office of the Secretary of State: to testify about the allegations in the lawsuit, election procedures, efforts to implement SEA 398, and other efforts to provide absentee voting options to print-disabled voters
8. Seth Cooper, senior manager at Baker Tilly: to testify about Baker Tilly's role in serving as a project-management vendor for the Indiana Election Division and the allegations in the lawsuit
9. Sean Fahey, Civix: to testify about the allegations in the lawsuit, Civix's role as vendor, Civix's efforts to implement an RAVBM tool through Demtech

10. Mike Brown or another representative of Demtech/Civix: to testify about the allegations in the lawsuit and Demtech's efforts to produce and implement an RAVBM tool
11. Any witness identified by Plaintiffs
12. Any expert witness identified by Plaintiffs
13. Any county election official in Plaintiffs' respective counties
14. All witnesses necessary for purposes of impeachment and/or rebuttal.
15. All witnesses necessary for authentication of documents

Final Exhibit List

1. Order Adopting Absentee Procedures for Voters with Print Disabilities (Sept. 27, 2021)
2. Any publication, manuals, or guides produced by the Indiana Election Division, including but not limited to the 2022 Indiana Election Administrator's Manual, the 2022 Military and Overseas Voters Guide, the 2022 Indiana Voter Information Guide, and the 2022 Election Day Handbook
3. Any presentation produced or presented by the Election Division or any of its contractors to county election officials regarding voting by print-disabled voters
4. Any forms prepared by the Election Division including but not limited to the ABS-VPD: Voters with Print Disabilities Combined Voter Registration and Absentee Ballot Application, Form ABS-25 and Absentee Voter Bill of Rights, and the ABS-MAIL: Application for Absentee Ballot by Mail Only form.

5. Voting machine instructional materials explaining accessibility of voting machines used in Indiana
6. Civix/DemTech RAVBM proposal response
7. Election Division newsletters from December 2020 to present
8. Federal government risk-management study
9. VSTOP Voting Systems Certification Protocol
10. VSTOP Voting System Field Test Report and Appendices
11. All affidavits or declarations filed at any time in this matter
12. All written discovery responses in this matter
13. All deposition transcripts and deposition exhibits in this matter
14. The reports and curriculum vitae of any expert witness disclosed in this matter
15. Declaration of Lou Ann Blake in *Hernandez v. New York State Board of Elections*, No. 1:20-cv-829-YK (S.D.N.Y.) (dated May 21, 2020)
16. Accessible Federal Write-In Ballot example and guidance issued by Election Division to county election officials
17. All communications from the Election Division to county election officials regarding voting by print-disabled voters during the May 2022 primary election and the November 2022 general election
18. All exhibits necessary for purposes of impeachment and/or rebuttal

Respectfully submitted,

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Attorney General of Indiana
Attorney No. 18857-49

Date: September 19, 2022

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