

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No. 1:23-cv-00861-TDS-JEP

VOTO LATINO, THE WATAUGA  
COUNTY VOTING RIGHTS TASK  
FORCE, DOWN HOME NORTH  
CAROLINA, SOPHIE JAE MEAD, and  
CHRISTINA BARROW,

Plaintiffs,

vs.

ALAN HIRSCH, in his official capacity  
as Chair of the State Board of Elections,  
JEFF CARMON, in his official capacity  
as Secretary of the State Board of  
Elections, STACY EGGERS IV, in his  
official capacity as Member of the State  
Board of Elections, KEVIN N. LEWIS, in  
his official capacity as Member of the  
State Board of Elections, SIOBHAN  
O'DUFFY MILLEN, in her official  
capacity as Member of the State Board of  
Elections, KAREN BRINSON BELL, in  
her official capacity as Executive Director  
of the State Board of Elections, DAWN Y.  
BAXTON, in her official capacity as  
Chair of the Durham County Board of  
Elections, DAVID K. BOONE, in his  
official capacity as Secretary of the  
Durham County Board of Elections, DR.  
JAMES P. WEAVER, in his official  
capacity as Member of the Durham  
County Board of Elections, PAMELA A.  
OXENDINE, in her official capacity as  
Member of the Durham County Board of  
Elections, DONALD H. BESKIND, in his  
official capacity as Member of the  
Durham County Board of Elections,  
MICHAEL BEHRENT, in his official

**ANSWER OF DEFENDANTS  
MICHAEL BEHRENT,  
ERIC ELLER,  
LETA COUNCILL,  
MATT WALPOLE, AND  
ELAINE ROTHENBERG**

capacity as Chair of the Watauga County Board of Elections, ERIC ELLER, in his official capacity as Member of the Watauga County Board of Elections, MATT WALPOLE, in his official capacity as Member of the Watauga County Board of Elections, LETA COUNCILL, in her official capacity as Member of the Watauga County Board of Elections, and ELAINE ROTHENBERG, in her official capacity as Member of the Watauga County Board of Elections,

Defendants.

Now come defendants MICHAEL BEHRENT, sued solely in his official capacity as Chair of the Watauga County Board of Elections; ERIC ELLER, sued solely in his official capacity as Member of the Watauga County Board of Elections; MATT WALPOLE, sued solely in his official capacity as Member of the Watauga County Board of Elections; LETA COUNCILL, sued solely in her official capacity as Member of the Watauga County Board of Elections; and ELAINE ROTHENBERG, sued solely in her official capacity as Member of the Watauga County Board of Elections, these defendants hereinafter referred to collectively as “The Watauga County Board of Elections Defendants”, by and through their undersigned counsel, and hereby respond to the correspondingly numbered paragraphs in the Plaintiffs’ Complaint for Declaratory and Injunctive Relief (hereinafter “Complaint”) as follows:

**“NATURE OF THE CASE”**

1. The Watauga County Board of Elections Defendants admit that the cited case and the Plaintiffs’ Complaint speak for themselves. Except as expressly admitted herein, the allegations contained in Paragraph 1 of the Complaint are denied.

2. The allegations contained in Paragraph 2 of the Complaint are denied.

3. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as expressly admitted herein, the allegations contained in Paragraph 3 of the Complaint are denied.

4. The allegations contained in Paragraph 4 of the Complaint are denied.

5. The allegations contained in Paragraph 5 of the Complaint are denied.

6. The Watauga County Board of Elections Defendants admit that the cited case speaks for itself. Except as expressly admitted herein, the allegations contained in Paragraph 6 of the Complaint are denied.

7. The allegations contained in Paragraph 7 of the Complaint are denied.

8. The allegations contained in Paragraph 8 of the Complaint are denied.

9. The allegations contained in Paragraph 9 of the Complaint are denied.

10. The Watauga County Board of Elections Defendants admit that Governor Cooper’s veto message speaks for itself. Except as expressly admitted herein, the allegations contained in Paragraph 10 of the Complaint are denied.

11. The Watauga County Board of Elections Defendants admit that Plaintiffs' Complaint speaks for itself. Except as expressly admitted herein, the allegations contained in Paragraph 11 of the Complaint are denied.

**“JURISDICTION AND VENUE”**

12. The Watauga County Board of Elections Defendants admit that Plaintiffs' Complaint speaks for itself. Except as expressly admitted herein, the allegations contained in Paragraph 12 of the Complaint are denied, it being further denied that the Plaintiffs are entitled to any relief whatsoever.

13. The Watauga County Board of Elections Defendants do not dispute that this Honorable Court has original jurisdiction over the subject matter of this action.

14. The Watauga County Board of Elections Defendants do not dispute that this Honorable Court has personal jurisdiction over the Watauga County Board of Elections Defendants, who have each been sued solely in their respective official capacities.

15. The allegations contained in Paragraph 15 of the Complaint are denied.

16. The Watauga County Board of Elections Defendants admit that the cited statutes and rules of civil procedure speak for themselves. Except as expressly admitted herein, the allegations contained in Paragraph 16 of the Complaint are denied, it being further denied that the Plaintiffs are entitled to any relief whatsoever.

**“PARTIES”**

17. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 17 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 17 of the Complaint are denied.

18. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 18 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 18 of the Complaint are denied.

19. The allegations contained in Paragraph 19 of the Complaint are denied.

20. The allegations contained in Paragraph 20 of the Complaint are denied.

21. The allegations contained in Paragraph 21 of the Complaint are denied.

22. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 22 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 22 of the Complaint are denied.

23. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 23 of the

Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the Watauga County Board of Elections Defendants admit that the cited case speaks for itself. Except as expressly admitted herein, the allegations contained in Paragraph 23 of the Complaint are denied.

24. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 24 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 24 of the Complaint are denied.

25. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 25 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 25 of the Complaint are denied.

26. The allegations contained in Paragraph 26 of the Complaint are denied.

27. The allegations contained in Paragraph 27 of the Complaint are denied.

28. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 28 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 28 of the Complaint are denied.

29. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 29 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 29 of the Complaint are denied.

30. The allegations contained in Paragraph 30 of the Complaint are denied.

31. It is admitted that the Watauga County Board of Elections followed instructions issued on November 16, 2022 by Karen Brinson Bell, the Executive Director of the North Carolina State Board of Elections, directing the Watauga County Board of Elections to NOT proceed with any hearing(s) regarding challenges asserted as to certain ballots, to include any challenge regarding the ballot purportedly cast by Plaintiff Sophie Jae Mead. To the contrary, no challenge to this ballot was considered, and this ballot was counted. It is expressly denied that the Watauga County Voting Rights Task Force had anything whatsoever to do with Ms. Mead's ballot being counted or any challenge to it not being considered. Except as expressly admitted or denied herein, the Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 31 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 31 of the Complaint are denied.

32. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 32 of the

Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 32 of the Complaint are denied.

33. The Watauga County Board of Elections Defendants lack information or knowledge sufficient to admit or deny the allegations contained in Paragraph 33 of the Complaint. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 33 of the Complaint are denied.

34. The Watauga County Board of Elections Defendants admit that the cited statutes and regulations speak for themselves. The Watauga County Board of Elections Defendants further admit that Alan Hirsch, Jeff Carmon, Stacy Eggers IV, Kevin Lewis, and Siobhan Millen are members of the North Carolina State Board of Elections. Except as specifically admitted herein, the allegations contained in Paragraph 34 of the Complaint are denied.

35. The Watauga County Board of Elections Defendants admit that the cited statutes and regulations speak for themselves. The Watauga County Board of Elections Defendants further admit, upon information and belief, that Karen Bell, who is sued solely in her official capacity, is the Executive Director of the North Carolina State Board of Elections. Except as specifically admitted herein, the allegations contained in Paragraph 35 of the Complaint are denied.



36. The Watauga County Board of Elections Defendants admit that the cited statutes speak for themselves. The Watauga County Board of Elections Defendants further admit, upon information and belief, that Dawn Y. Baxton is the Chair of the Durham County Board of Elections, that David K. Boone is the Secretary of the Durham County Board of Elections, and that Dr. James P. Weaver, Pamela A. Oxendine, and Donald H. Beskind, each of whom was sued solely in his or her official capacities, are members of the Durham County Board of Elections. Except as specifically admitted herein, the allegations contained in Paragraph 36 of the Complaint are denied.

37. The Watauga County Board of Elections Defendants admit that the cited statutes speak for themselves. The Watauga County Board of Elections Defendants further admit that Michael Behrent is the Chair of the Watauga County Board of Elections, and that Leta Councill, Eric Eller, Matt Walpole, and Elaine Rothenberg, each of whom having been sued solely in their official capacities, are members of the Watauga County Board of Elections. Except as specifically admitted herein, the allegations contained in Paragraph 37 of the Complaint are denied.

### **“STATEMENT OF FACTS AND LAW”**

- I. **“Same-day registration is a secure, long-standing method of voter registration and voting that has been extremely popular among North Carolina voters since its inception.”**

38. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 38 of the Complaint are denied.

39. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 39 of the Complaint are denied.

40. The Watauga County Board of Elections Defendants admit that same day registration is secure with the enactment of S.B. 747. Except as specifically admitted herein, the allegations contained in Paragraph 40 of the Complaint are denied.

**“North Carolina’s registration process”**

41. The Watauga County Board of Elections Defendants admit that the cited statute and voter registration process speak for themselves. Except as specifically admitted herein, the allegations contained in Paragraph 41 of the Complaint are denied.

42. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 42 of the Complaint are denied.

43. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 43 of the Complaint are denied.

44. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 44 of the Complaint are denied.

45. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 45 of the Complaint are denied.

46. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 46 of the Complaint are denied.

**“Additional steps required of same-day registrants before the Undeliverable Mail Provision”**

47. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 47 of the Complaint are denied.

48. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 48 of the Complaint are denied.

49. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 49 of the Complaint are denied.

**“Same-day registration after the Undeliverable Mail Provision”**

50. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 50 of the Complaint are denied.

51. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 51 of the Complaint are denied.

52. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 52 of the Complaint are denied.

53. The allegations contained in Paragraph 53 of the Complaint are denied.

54. The allegations contained in Paragraph 54 of the Complaint are denied.

**II. “Meaningful and reliable same-day registration is particularly critical to the enfranchisement of eligible Black, Latinx, and young North Carolinians.”**

55. The allegations contained in Paragraph 55 of the Complaint are denied.

56. The Watauga County Board of Elections Defendants lack information sufficient to admit or deny the allegations contained in Paragraph 56 of the Complaint because Plaintiffs offer no citation for the statistics cited in the paragraph. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 56 of the Complaint are denied.

57. The Watauga County Board of Elections Defendants admit that the cited case speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 57 of the Complaint are denied.

58. The Watauga County Board of Elections Defendants admit that the cited case speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 58 of the Complaint are denied.

59. The allegations contained in Paragraph 59 of the Complaint are denied.

60. The Watauga County Board of Elections Defendants lack information sufficient to admit or deny the allegations contained in Paragraph 60 of the Complaint because Plaintiffs offer no citation to the referenced 2021 study. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 60 of the Complaint are denied.

61. The Watauga County Board of Elections Defendants lack information sufficient to admit or deny the allegations contained in Paragraph 61 of the Complaint because Plaintiffs offer no citation for the statistics cited in the paragraph. To the extent any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 61 of the Complaint are denied.

62. The Watauga County Board of Elections Defendants lack information sufficient to admit or deny the allegations contained in Paragraph 61 of the Complaint because Plaintiffs offer no citation for the statistics cited in the paragraph. To the extent

any further response is required on the part of the Watauga County Board of Elections Defendants, the allegations contained in Paragraph 61 of the Complaint are denied.

63. The allegations contained in Paragraph 63 of the Complaint are denied.

64. The allegations contained in Paragraph 64 of the Complaint are denied.

65. The allegations contained in Paragraph 65 of the Complaint are denied.

66. The allegations contained in Paragraph 66 of the Complaint are denied.

**III. “The Undeliverable Mail Provision significantly undermines the same- day registration process.”**

67. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 67 of the Complaint are denied.

68. The allegations contained in Paragraph 68 of the Complaint are denied.

69. The allegations contained in Paragraph 69 of the Complaint are denied.

70. The allegations contained in Paragraph 70 of the Complaint are denied.

71. The allegations contained in Paragraph 71 of the Complaint are denied.

72. The Watauga County Board of Elections Defendants admit that the cited source speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 72 of the Complaint are denied.

73. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 73 of the Complaint are denied.

74. The allegations contained in Paragraph 74 of the Complaint are denied.

75. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 75 of the Complaint are denied.

76. The Watauga County Board of Elections Defendants admit that the cited statute speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 76 of the Complaint are denied.

77. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 77 of the Complaint are denied.

78. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 78 of the Complaint are denied.

**IV. “The Undeliverable Mail Provision is not necessary to secure the state’s elections or guard against ineligible registration.”**

79. The allegations contained in Paragraph 79 of the Complaint are denied.

80. The allegations contained in Paragraph 80 of the Complaint are denied.

81. The allegations contained in Paragraph 81 of the Complaint are denied.

82. The allegations contained in Paragraph 82 of the Complaint are denied.

**“CLAIMS FOR RELIEF COUNT I**  
**Fourteenth Amendment: Denial of Due Process**  
**U.S. Const. Amend. XIV; 42 U.S.C. § 1983”**

83. The Watauga County Board of Elections Defendants incorporate by reference their responses to Paragraphs 1-82 as if set forth fully herein.

84. The allegations contained in Paragraph 84 of the Complaint contain a legal conclusion to which no response is required. To the extent any response is required on the part of the Watauga County Board of Elections Defendants, the Watauga County Board of Elections Defendants specifically deny that S.B. 747 violates any statute, law, or constitutional provision and further deny that Plaintiffs are entitled to any relief whatsoever.

85. The allegations contained in Paragraph 85 of the Complaint contain a legal conclusion to which no response is required. To the extent any response is required on the part of the Watauga County Board of Elections Defendants, the Watauga County Board of Elections Defendants specifically deny that S.B. 747 violates any statute, law, or constitutional provision and further deny that Plaintiffs are entitled to any relief whatsoever.

86. The allegations contained in Paragraph 86 of the Complaint contain a legal conclusion to which no response is required. To the extent any response is required on the part of the Watauga County Board of Elections Defendants, the Watauga County Board of Elections Defendants specifically deny that S.B. 747 violates any statute, law, or constitutional provision and further deny that Plaintiffs are entitled to any relief whatsoever.

87. The allegations contained in Paragraph 87 of the Complaint contain a legal conclusion to which no response is required. To the extent any response is required on the part of the Watauga County Board of Elections Defendants, the Watauga County Board of



Elections Defendants specifically that they have, or will, “deprive voters – who have cast valid ballots and submitted valid voter registration applications through the same-day registration process provided by the State – without adequate procedures.”

88. The allegations contained in Paragraph 88 of the Complaint are denied.

89. The allegations contained in Paragraph 89 of the Complaint are denied.

90. The Watauga County Board of Elections Defendants admit that S.B. 747 speaks for itself. Except as specifically admitted herein, the allegations contained in Paragraph 90 of the Complaint are denied.

91. The allegations contained in Paragraph 91 of the Complaint are denied.

92. The allegations contained in Paragraph 92 of the Complaint are denied.

## **“COUNT II**

### **First and Fourteenth Amendments: Undue Burden on the Right to Vote U.S. Const. Amend. I and XIV; 42 U.S.C. § 1983, 28 U.S.C. §§ 2201, 2202”**

93. The Watauga County Board of Elections Defendants incorporate by reference their responses to Paragraphs 1-92 as if set forth fully herein.

94. The allegations contained in Paragraph 94 of the Complaint contain a legal conclusion to which no response is required. To the extent any response is required on the part of the Watauga County Board of Elections Defendants, the Watauga County Board of Elections Defendants specifically deny that S.B. 747 violates any statute, law, or constitutional provision and further deny that Plaintiffs are entitled to any relief whatsoever.

95. The allegations contained in Paragraph 95 of the Complaint contain a legal conclusion to which no response is required. To the extent any response is required on the part of the Watauga County Board of Elections Defendants, the Watauga County Board of Elections Defendants specifically deny that S.B. 747 violates any statute, law, or constitutional provision and further deny that Plaintiffs are entitled to any relief whatsoever.

96. The allegations contained in Paragraph 96 of the Complaint are denied.

97. The allegations contained in Paragraph 97 of the Complaint are denied.

98. The allegations contained in Paragraph 98 of the Complaint are denied.

#### **“PRAYER FOR RELIEF”**

As for the Plaintiffs’ unnumbered “PRAYER FOR RELIEF”, the Watauga County Board of Elections Defendants deny that the Plaintiffs, or any of them, are entitled to any relief whatsoever.

Any allegations contained in Paragraphs 1-98 of the Complaint not specifically admitted are denied.

#### **AFFIRMATIVE DEFENSES**

##### **FIRST AFFIRMATIVE DEFENSE**

Plaintiffs’ Complaint, in whole or in part fails to state a claim upon which relief can be granted and thus should be dismissed.

### **SECOND AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert the claims in their Complaint.

### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs' claims are not ripe.

### **FOURTH AFFIRMATIVE DEFENSE**

The Watauga County Board of Elections Defendants are not proper parties or defendants to this action. In the alternative, if the Watauga County Board of Elections Defendants are in fact proper defendants in this action, then the Plaintiffs must likewise join as defendants the Boards of Elections from the other ninety-nine counties across the State of North Carolina.

### **FIFTH AFFIRMATIVE DEFENSE**

To the extent state court litigation is filed over the allegations in the Complaint, or the Complaint raises issues under the state constitution not yet resolved by the North Carolina Supreme Court, the Court should abstain from considering those claims.

WHEREFORE, the Watauga County Board of Elections Defendants move the Court:

1. That Plaintiffs' claims against Watauga County Board of Elections Defendants be dismissed with prejudice and that judgment be entered for the Watauga County Board of Elections Defendants on all claims;

2. That the Watauga County Board of Elections Defendants be awarded their attorneys' fees and costs; and

3. That the Watauga County Board of Elections Defendants be awarded such other and further relief as the Court may deem just and proper.

Respectfully submitted, this the 16th day of January, 2024.

/s/ BRADLEY G. WOOD

Bradley O. Wood

N.C. State Bar No.: 22392

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*Counsel for Defendants Michael Behrent,  
Eric Eller, Leta Councill, Matt Walpole, and  
Elaine Rothenberg*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 16, 2024, I electronically filed the **ANSWER OF DEFENDANTS MICHAEL BEHRENT, ERIC ELLER, LETA COUNCILL, MATT WALPOLE, AND ELAINE ROTHENBERG** with the Clerk of Court using the CM/ECF system, which will send notification of said filing to all Counsel of record.

/s/ BRADLEY O. WOOD

Bradley O. Wood

N.C. State Bar No.: 22392

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