

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA

Plaintiff,

v.

BRAD RAFFENSPERGER, in his
Official Capacity as Secretary of State
for the State of Georgia,

Defendant.

CASE NO: 1:26-CV-485-ELR

**CROSS-MOTION TO COMPEL
PRODUCTION OF FEDERAL
ELECTION RECORDS**

PLEASE TAKE NOTICE of the United States of America's Cross-Motion to Compel Production of Federal Election Records pursuant to 52 U.S.C. § 20701, et seq., filed on February 19, 2026. The United States' Cross-Motion is supported by the record and prior pleadings and proceedings in this case and the accompanying Declaration of Eric Neff, Exhibits, and the United States' Memorandum of Law in support of its Cross-Motion and in opposition to: (1) the Motion to Dismiss by Defendant Brad Raffesnperger (Doc. 16); (2) the Motion to Dismiss by Intervenor-Defendants Common Cause and Rosario Palacios (Doc. 22), and (3) the Motion to Dismiss by Intervenor-Defendants Black Voters Matter Fund, Communication Workers of America Local 3204, and Communication Workers of America Retired Members Council (Doc. 23).

The United States respectfully requests that the Court enter an order that: (1) grants the United States' Cross-Motion to Compel; (2) denies all the Motions to Dismiss (Docs. 16, 22, 23); (3) directs Secretary Raffensperger to produce to the United States an electronic copy of Georgia's statewide Voter Registration List with all fields, including each registrant's name, date of birth, address, and as required by HAVA, the last four digits of the registrant's social security number, driver's license/state identification number or the unique HAVA identifier; and (4) such other relief as the Court deems just and proper.

DATED: February 19, 2026

Respectfully submitted,

HARMEET K. DHILLON
Assistant Attorney General
Civil Rights Division

ERIC V. NEFF
Acting Chief, Voting Section
Civil Rights Division

/s/ *Brittany E. Bennett*

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CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2026, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ *Brittany E. Bennett*

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