

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

DONALD J. TRUMP, in his capacity :  
As Candidate for President, et al., :  
: :  
Petitioner, : CIVIL ACTION FILE NO.:  
: :  
vs. : 2020-CV-343255  
: :  
BRAD RAFFENSPERGER, :  
in his official capacity as the Georgia :  
Secretary of State, et al., : :  
: :  
Respondents. :  
\_\_\_\_\_ :

**AFFIDAVIT OF DANIEL W. WHITE**

STATE OF GEORGIA  
COUNTY OF COBB

Personally appeared before me, the undersigned officer duly authorized by law to administer oaths, DANIEL W. WHITE, who, after being duly sworn, stated on oath his personal knowledge as follows:

1.

My name is Daniel W. White. I am over the age of 21 and am in all ways competent to make this affidavit. I have personal knowledge of the facts stated herein and know them to be true.

2.

I am counsel of record for the Cobb County Board of Elections (“Cobb BOER”) and Registrations and Janine Eveler in her role as Director of the Cobb County Elections Department. I am a partner at the law firm of Haynie, Litchfield & White, PC.

3.

I have represented Cobb BOER and Janine Eveler in all matters related to the above-styled action and I have represented clients in similar actions before this court and before the other courts of this state. I am familiar with this type of case and with the level of expertise required by attorneys in such a case.

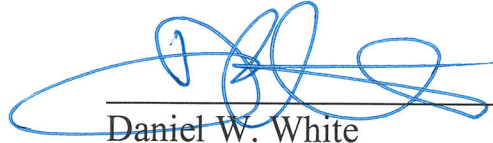
4.

The Cobb County BOER has been billed at my customary hourly rate for governmental entities of \$145.00 per hour, which is reasonable for an attorney in this market with 16 years of experience practicing law.

5.

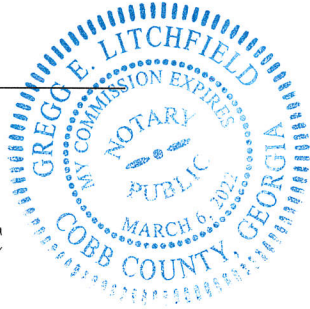
Since the origination of this matter, Cobb BOER has incurred attorney’s fees and legal expenses from Haynie, Litchfield & White, PC in the amount of \$10,875.00 to date, as a direct consequence of the present matter, using the customary rate. Those charges are set forth in the invoice attached to this Affidavit as Exhibit “A”.

This 22<sup>nd</sup> day of February, 2021.



\_\_\_\_\_  
Daniel W. White  
Georgia Bar No. 153033

Sworn to and subscribed before  
me this 22<sup>nd</sup> day of February, 2021.

  
\_\_\_\_\_  
Notary Public

Haynie, Litchfield & White, PC  
222 Washington Avenue  
Marietta, Georgia 30060  
(770) 422-8900 (telephone)  
(770) 424-8900 (facsimile)

# Exhibit "A"

: Sk` [M> [fUZ\W~ I Z[fW` ha[UWESfW ent  
for charges related to  
*Trump v. Raffensperger, et al.*  
Fulton County Superior Court  
CAF 2020-CV-343255  
(current through February 1, 2021)

**HAYNIE, LITCHFIELD & WHITE, P.C.**  
ATTORNEYS AT LAW  
222 WASHINGTON AVENUE  
MARIETTA, GA 30060

DOUGLAS R. HAYNIE  
GREGG E. LITCHFIELD  
DANIEL W. WHITE

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gel@hlw-law.com  
dwhite@hlw-law.com

Slip ID		User	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
59738	TIME	DWW CO 145	2.50	145.00	362.50
12/7/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review election contest complaint and emergency motion for Temporary Restraining Order and Int Inj; begin research and notes for response.					
59744	TIME	DWW CO 145	2.00	145.00	290.00
12/8/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Research election challenge pleadings and service requirements; draft notice of special appearance; e-file notice; review docket; continue research and draft of answer and Motion to Dismiss.					
59749	TIME	DWW CO 145	2.00	145.00	290.00
12/8/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review docket, emergency Motion for Temporary Injunction and Motion to Dismiss; review plaintiffs motion for emergency hearing; continue draft of response.					
59752	TIME	DWW CO 145	1.50	145.00	217.50
12/9/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review docket and e-filing notices; review response to Motion for Temporary Injunction and request for hearing; review notices of appearance.					
59755	TIME	DWW CO 145	0.80	145.00	116.00
12/9/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review docket; draft email to K. Hilbert regarding appearance and communications; review reply email.					

Slip ID		User	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
59758	TIME	DWW CO 145	1.50	145.00	217.50
12/9/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review docket; review emergency Motion for Temporary Injunction and motion to amend; review attachments to amended complaint; continue draft of response.					
59759	TIME	DWW CO 145	2.30	145.00	333.50
12/10/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review letter from R. Smith regarding preservation and inspection of documents; review prior response; draft response letter; review docket and withdrawal of motion; review additional notice filings.					
59763	TIME	DWW CO 145	2.00	145.00	290.00
12/10/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review Motion for Temporary Injunction from NAACP and individual voters; review draft of answer; update draft of answer and AF.					
59765	TIME	DWW CO 145	1.50	145.00	217.50
12/11/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review efilng notice; review docket; download new motion and response; continue draft of Answer and AF.					
59767	TIME	DWW CO 145	1.00	145.00	145.00
12/11/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review email from A. Sabzevari regarding motion to amend and other filings; draft reply email regarding counties; draft email regarding conference call; review reply emails.					
59769	TIME	DWW CO 145	2.80	145.00	406.00
12/11/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Schedule call regarding response; review notice from Ga. Supreme Ct. regarding filing of appeal; review appellate docket; email to Sup. Ct. Clerk; review reply; review code section cited for appeal; review court rules and research jurisdiction; begin draft of notice of appearance for appeal.					

Slip ID		User	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
59772	TIME	DWW CO 145	0.80	145.00	116.00
12/12/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Draft email to K. Hilbert; review reply email; review order from Supreme Court denying interlocutory appeal; review code section regarding EC schedule.					
59783	TIME	DWW CO 145	2.80	145.00	406.00
12/15/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review order regarding response regarding appointment of judge; review notice of appearance; review dockets and motions to intervene; review response briefs.					
59788	TIME	DWW CO 145	1.00	145.00	145.00
12/15/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review email with notice of appearance; review efilings notice regarding State motion to dismiss; review Motion to Dismiss.					
59790	TIME	DWW CO 145	1.30	145.00	188.50
12/16/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Finish review of Motion to Dismiss; research cases cited; update and continue draft of county Motion to Dismiss.					
59793	TIME	DWW CO 145	2.30	145.00	333.50
12/16/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review docket; continue draft of Motion to Dismiss.					
59800	TIME	DWW CO 145	1.00	145.00	145.00
12/17/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review notices of appearance; review docket and new filings; review response in objection to Motion for Temporary Injunction; continue research and draft for Motion to Dismiss.					
59805	TIME	DWW CO 145	0.50	145.00	72.50
12/18/2020		Legal Services	0.00	T@1	
Billed	G:15965 1/4/2021	CO Board Elec	0.00		
Review emails regarding PHV applications and proposed orders; review docket; review objection to Motion for Temporary Injunction					

Slip ID		User	Units	Rate	Slip Value
	Dates and Time	Activity	DNB Time	Rate Info	
	Posting Status	Client	Est. Time	Bill Status	
	Description	Reference	Variance		
	and request to consolidate.				
59807	TIME	DWW CO 145	2.30	145.00	333.50
	12/21/2020	Legal Services	0.00	T@1	
	Billed G:15965 1/4/2021	CO Board Elec	0.00		
	Review reply brief regarding Motion for Temporary Injunction; review objection to Motion for Temporary Injunction by Dem electors; review docket and unserved notices; review Election Challenge statute.	Trump v. Raffe	0.00		
59810	TIME	DWW CO 145	2.00	145.00	290.00
	12/21/2020	Legal Services	0.00	T@1	
	Billed G:15965 1/4/2021	CO Board Elec	0.00		
	Review motion to disqualify counsel; review email regarding order for appointment; review docket and Election Challenge statute; continue draft of Motion to Dismiss and answer.	Trump v. Raffe	0.00		
59812	TIME	DWW CO 145	2.00	145.00	290.00
	12/22/2020	Legal Services	0.00	T@1	
	Billed G:15965 1/4/2021	CO Board Elec	0.00		
	Review emails regarding service of process; review service statute and Election Challenge statute; draft reply email; review replies from other county counsel; continue draft of AAF.	Trump v. Raffe	0.00		
59818	TIME	DWW CO 145	2.80	145.00	406.00
	12/23/2020	Legal Services	0.00	T@1	
	Billed G:15965 1/4/2021	CO Board Elec	0.00		
	Review efilng notices and docket; review motion for judgment on the pleadings; review objection to MJP; review motion to exclude expert witness testimony; continue draft of Motion to Dismiss; review Motion to Dismiss for failure to perfect service; update draft of Motion to Dismiss.	Trump v. Raffe	0.00		
59823	TIME	DWW CO 145	1.00	145.00	145.00
	12/28/2020	Legal Services	0.00	T@1	
	Billed G:15965 1/4/2021	CO Board Elec	0.00		
	Review motion to consolidate; review State response to second motion for emergency relief.	Trump v. Raffe	0.00		
59831	TIME	DWW CO 145	1.30	145.00	188.50
	12/29/2020	Legal Services	0.00	T@1	
	Billed G:15965 1/4/2021	CO Board Elec	0.00		
	Review efilng notices and docket; review	Trump v. Raffe	0.00		



Slip ID		User	Units	Rate	Slip Value
	Dates and Time	Activity	DNB Time	Rate Info	
	Posting Status	Client	Est. Time	Bill Status	
	Description	Reference	Variance		
	filing regarding request to appoint judge from adjacent circuit; review reply brief for Motion for Temporary Injunction.				
59837	TIME	DWW CO 145	2.00	145.00	290.00
	12/30/2020	Legal Services	0.00	T@1	
	Billed G:15965 1/4/2021	CO Board Elec	0.00		
	Review response to MJP; review response to Motion to Dismiss for failure to serve; review case law regarding atty fees; begin outline of motion regarding AF.				
59908	TIME	DWW CO 145	0.50	145.00	72.50
	1/4/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review email from clerk with order appointing Judge Grubbs to hear case; forward to J Eveler; review election contest statute re: hearing and notice.				
59911	TIME	DWW CO 145	1.50	145.00	217.50
	1/4/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review emails from clerk re: entries of service and motion to amend; draft email to county counsel re: hearing date and judge assignment; review reply emails; draft reply; review draft of answer and Motion to Dismiss; begin update to answer draft.				
59913	TIME	DWW CO 145	1.80	145.00	261.00
	1/4/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review reply emails from county counsel re: hearing; draft email re: hearing; continue research and draft of Motion to Dismiss.				
59920	TIME	DWW CO 145	1.30	145.00	188.50
	1/5/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review docket and Sec of State answer; update draft of answer; review election code procedures; phone call from J. Hancock .				
59927	TIME	DWW CO 145	2.70	145.00	391.50
	1/6/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Phone call to T. Davis; review motion re: witnesses testifying remotely; review docket and entries of appearance; continue draft of Motion to Dismiss and update draft of				

Slip ID		User	Units	Rate	Slip Value
	Dates and Time	Activity	DNB Time	Rate Info	
	Posting Status	Client	Est. Time	Bill Status	
	Description	Reference	Variance		
	affirmative defenses in Answer.				
59928	TIME	DWW CO 145	3.00	145.00	435.00
	1/6/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review email from T. Davis with Rule Nisi;	Trump v. Raffe	0.00		
	review emails from counsel re: hearing and				
	witnesses; review reply email from T. Davis;				
	phone call from A. Brumbaugh; phone call				
	from M. Wilson; call to J. Hancock; finish				
	draft of Motion to Dismiss; review email re:				
	phone conference to prepare for hearing.				
59930	TIME	DWW CO 145	0.80	145.00	116.00
	1/6/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review email from T. Davis re: hearing	Trump v. Raffe	0.00		
	schedule and witnesses; review exhibits				
	from petition and responses for witness list.				
59932	TIME	DWW CO 145	3.50	145.00	507.50
	1/7/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review emails re: meeting; draft reply;	Trump v. Raffe	0.00		
	review clerk's emails with entries of service;				
	update draft of Motion to Dismiss; Zoom				
	conference with county counsel; review				
	email from A. Brumbaugh with draft of				
	Motion to Dismiss; update draft of Motion to				
	Dismiss; review and finalize draft of Answer;				
	continue draft of oral argument.				
59934	TIME	DWW CO 145	4.50	145.00	652.50
	1/7/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Finish draft of Motion to Dismiss; send for	Trump v. Raffe	0.00		
	review; review draft of answer and AF;				
	continue draft of OA; review emails re:				
	dismissal; phone call from G. Shenton; draft				
	email to G. Shenton; call to K. Hilbert; draft				
	email to K. Hilbert; review reply email; call to				
	T. Davis; review emails re: hearing; prepare				
	Motion to Dismiss of e-filing; e-file Motion to				
	Dismiss; continue draft of oral argument and				
	witness questions; review filing confirmation				
	of Motion to Dismiss; review efile				
	confirmation of voluntary dismissal; call to T.				
	Davis; review email from T. Davis; review				
	email from G. Shenton; draft email to J.				
	Eveler; call to J. Eveler; review response to				
	dismissal filed by State; call to C. Anulewitz.				

Slip ID		User	Units	Rate	Slip Value
	Dates and Time	Activity	DNB Time	Rate Info	
	Posting Status	Client	Est. Time	Bill Status	
	Description	Reference	Variance		
59937	TIME	DWW CO 145	1.80	145.00	261.00
	1/8/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review email from G. Shenton; draft reply email with filed docs; call from C. Anulewitz; review election contest statute and Civil Practice Act re: dismissals; continue outline and research for motion for AF.	Trump v. Raffe	0.00		
59963	TIME	DWW CO 145	1.30	145.00	188.50
	1/15/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Call to county counsel re: AF motion; review outline and research for AF motion; continue draft.	Trump v. Raffe	0.00		
59978	TIME	DWW CO 145	0.80	145.00	116.00
	1/20/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review motion to seal exhibits; review exhibits and email from state; review AF motion research and calendar.	Trump v. Raffe	0.00		
59984	TIME	DWW CO 145	0.30	145.00	43.50
	1/21/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review email from T. Davis re: motion to seal; review reply emails re: motion to seal.	Trump v. Raffe	0.00		
59994	TIME	DWW CO 145	0.50	145.00	72.50
	1/22/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review email re: no objection to order sealing; review email re: AF motion; draft reply email.	Trump v. Raffe	0.00		
59996	TIME	DWW CO 145	2.50	145.00	362.50
	1/25/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review Plaintiff's response to motion to seal; review response email by NAACP; review email from K. Hilbert; draft reply email re: nonobjection by Cobb; review reply emails re: nonobjection; continue draft of MFA.	Trump v. Raffe	0.00		
59999	TIME	DWW CO 145	0.20	145.00	29.00
	1/25/2021	Legal Services	0.00	T@1	
	Billed G:15976 2/1/2021	CO Board Elec	0.00		
	Review order from J. Grubbs sealing records.	Trump v. Raffe	0.00		

Slip ID		User	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client	Est. Time	Bill Status	
Description		Reference	Variance		
60004	TIME	DWW CO 145	2.30	145.00	333.50
1/26/2021		Legal Services	0.00	T@1	
Billed	G:15976 2/1/2021	CO Board Elec	0.00		
Review clerk's emails re: entries of service; review email re: order; review AF research and draft; review billing and begin draft of affidavit; continue draft of motion.					
60014	TIME	DWW CO 145	1.50	145.00	217.50
1/27/2021		Legal Services	0.00	T@1	
Billed	G:15976 2/1/2021	CO Board Elec	0.00		
Continue draft of affidavit and AF motion.					
60016	TIME	DWW CO 145	1.00	145.00	145.00
1/27/2021		Legal Services	0.00	T@1	
Billed	G:15976 2/1/2021	CO Board Elec	0.00		
Review email from Ga. Supreme Court re: remittitur; review docket; update draft of affidavit.					
60025	TIME	DWW CO 145	0.20	145.00	29.00
1/28/2021		Legal Services	0.00	T@1	
Billed	G:15976 2/1/2021	CO Board Elec	0.00		
Review email from Fulton Clerk re: remittitur. Trump v. Raffe					
Grand Total					
		Billable	75.00		10875.00
		Unbillable	0.00		0.00
		Total	75.00		10875.00

**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2021 I electronically filed the foregoing AFFIDAVIT OF DANIEL W. WHITE with the Clerk of Court using the Court's electronic filing system which will automatically send email notification of such filing to all attorneys of record.

/s/ Daniel W. White \_\_\_\_\_  
DANIEL W. WHITE  
Georgia Bar No. 153033  
*Attorney for Defendant Janine Eveler and  
Cobb County Board of Elections and  
Registration*

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