

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)
)
vs.) Case No. 23SC188947
)
HARRISON FLOYD)
)
DEFENDANT.)

DEFENDANT HARRISON FLOYD'S MOTION TO UNSEAL NOVEMBER 03, 2020
GENERAL ELECTION MATERIALS

COMES NOW, DEFENDANT HARRISON FLOYD, by counsel, and moves the Court to unseal ALL the items identified in Defendant Harrison Floyd's subpoenas (attached as Exhibit "A") pertaining to the November 03, 2020 General Election pursuant to Ga. Code Ann. § 21-2-500. As grounds, Mr. Floyd states:

1. The discovery requests attached as Exhibit "A" seek items from the November 03, 2020 General Election, which if unsealed will not interfere with any election nor violate the anonymity of the secret ballot.
2. The General Election materials are relevant and central to Mr. Floyd's defense.
3. Mr. Floyd seeks the materials identified in Exhibit "A" because the State asserts that he and other defendants knowingly made false statements about the November 03, 2020 General Election and knowingly sought to overturn the November 03, 2020 election results. The evidence gathered under the subpoenas to produce documentary and electronic evidence may be exculpatory in nature in regard to the alleged false statements and other conduct claimed in the indictment.
4. This Court has the authority to unseal ALL the items identified in Exhibit "A" from the November 03, 2020 General Election for purposes such as allowing discovery, e. g.

inspection, copying, and scanning pursuant to Ga. Code Ann. § 21-2-500 (a) which states in pertinent part that: “The clerk, county records manager, or the office or officer designated by the clerk shall hold such ballots and other documents under seal, unless otherwise directed by the superior court . . .” [Emphasis added].

5. The inspection, copying, or scanning of the Exhibit “A” materials will not be burdensome because the entities served with the subpoenas only need to provide access and observe under state law. Ga. Code Ann. § 21-2-72 (2023). Mr. Floyd is not seeking any proprietary information in the attached Exhibit “A”.

6. Mr. Floyd asks the Court to enter an order allowing the inspection, copying, and scanning to be used as possible evidence in this criminal proceeding for the purpose of rebutting the State’s allegations in the indictment that false statements were allegedly made by the defendants and that the items requested in Exhibit “A” are clearly within the scope of evidence that a criminal defendant should be given access to for purposes allowed under the 6th Amendment Confrontation Clause.

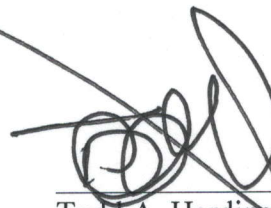
WHEREFORE, DEFENDANT HARRISON FLOYD prays:

- a). that the Court **CONDUCTS** an evidentiary hearing;
- b). that the Court **GRANTS** this motion;
- c). that the Court **ORDERS** that **ALL** the items enumerated in Exhibit “A” from the November 03, 2020 General Election be unsealed for discovery purposes;
- d). that the Court **ORDERS** access for inspection, copying, and scanning of **ALL** the items enumerated on Exhibit “A” within seven (7) calendar days of the entry of this order; **AND**

e). for any other relief the Court deems just and proper.

Respectfully submitted this the 11th day of September, 2023.

HARDING LAW FIRM, LLC

A handwritten signature in black ink, appearing to read 'T.A. Harding', is written over a horizontal line. The signature is stylized and somewhat scribbled.

Todd A. Harding For the Firm
Ga. Bar No.: 101562
Attorney for Harrison Floyd

Harding Law Firm, LLC
Attorneys at Law
113 E. Solomon Street
Griffin, Georgia 30223
(770) 229-4578
(770) 228-9111 facsimile

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,)
)
vs.) Case No. 23SC188947
)
HARRISON FLOYD)
)
DEFENDANT.)

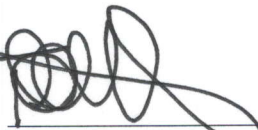
CERTIFICATE OF SERVICE

I hereby certify that on this day I have served counsel of record with the foregoing
**DEFENDANT HARRISON FLOYD'S MOTION TO UNSEAL NOVEMBER 03, 2020
GENERAL ELECTION MATERIALS** filed by electronic transmission addressed to the
following:

Fani T. Willis, DA
136 Pryor Street, SW
3rd Floor
Atlanta, Georgia 30303

Respectfully submitted this the 11th day of September, 2023.

HARDING LAW FIRM, LLC



Todd A. Harding, For the Firm
Ga. Bar No.: 101562
Attorney for Harrison Floyd

Harding Law Firm, LLC
Attorneys at Law
113 E. Solomon Street
Griffin, Georgia 30223
(770) 229-4578
(770) 228-9111 facsimile

EXHIBIT "A"

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

STATE OF GEORGIA,)	
)	
vs.)	Case No. <u>23SC188947</u>
)	
HARRISON FLOYD)	
)	
DEFENDANT.)	

SUBPOENA DUCES TECUM

**TO: RETURN RECEIPT REQUESTED NO.: 7022 1670 0001 8142 2852
Fulton County Board of Registration and Elections
Attn.: Patrise Perkins-Hooker, Chairperson
130 Peachtree Street, SW
Suite 2186
Atlanta, Georgia 30303**

YOU ARE HEREBY COMMANDED:

That laying all other business aside, you are commanded to be at and appear at the Harding Law Firm, LLC located at: 113 E. Solomon Street, Griffin, Georgia 30223, on October 16, 2023, at 9:00 a.m., and to bring with you into said law firm certain matters to be used as evidence in the matter of: **State of Georgia v. Harrison Floyd, Fulton County State Court Case No.: 23SC188947.**

You are required to produce any and all unredacted and unedited original items listed below that are in your possession or are under Your custody or control pursuant to Code Ann. §24-13-23:

DEFINITIONS

1. "Adjudication" refers to the process of reviewing a voter's ballot to determine what votes were intended by the voter who cast the ballot.
2. "Ballot marking device" refers to any electronic device used to complete an electronic ballot which is then printed onto paper.
3. "Ballot scanner" refers to an electronic device that provides optical scanning of ballots to produce a digital image of the ballot and/or to read the votes marked on the ballot.
4. "Client" refers to a computer that connects to a computer server.
5. "Controlling computer" refers to a computer connected to another electronic device, that is

- used to control the behavior of the connected electronic device.
6. "Document" refers to any writing or electronically stored information stored in any medium from which information can be obtained, including drawings, graphs, charts, photographs, sound recordings, video recordings, images, or other data or data compilations.
 7. "Drive" or "drives" refers to any medium for the storage of electronic or digital data.
 8. "EMS" refers to an Election Management System or any set of electronic equipment used to facilitate the counting, tabulation, and reporting of results in a public election.
 9. "Electronic election system" refers to all electronic or computerized devices and equipment used to cast ballots, count votes, tabulate votes, or report results in an election.
 10. "EnCase" refers to the digital forensic data collection and investigation technology produced by Guidance Software.
 11. "Forensic copy" refers to a file-level exact duplication of electronic data.
 12. "Forensic image" refers to a bit-by-bit, sector-by-sector direct copy of a physical storage devices containing electronic data, including all files, folders and unallocated, free, and slack space.
 13. "ImageCast Central" or "ICC" refers to the electronic system distributed by Dominion Voting with that name.
 14. "ImageCast Evolution" or "ICE" refers to the electronic device distributed by Dominion Voting, with that name, that can be used as a ballot marking device and tabulator. 2
 15. "ImageCast Precinct" or "ICP" refers to the electronic device distributed by Dominion Voting, with that name, that can optically scan and tabulate votes from paper ballots.
 16. "ImageCast X" or "ICX" refers to the electronic device distributed by Dominion Voting, with that name, that can be used as a ballot marking device.
 17. "November 2020 Election" refers to the general election in the United States for which Election Day was November 3, 2020.
 18. "Server" refers to a computer server or computer that stores, processes, and manages data for other computers or devices on a computer network.
 19. "Storage device" refers to any medium for the storage of electronic or digital data.
 20. "Tabulator" refers to any electronic device used to count or tabulate votes from paper ballots.
 21. "Workstation" refers to an individual computer, which may or may not be connected to a computer network, used to facilitate one or more specific tasks or processes.

22. "You" and "Your" refer to the recipient of this subpoena.

ITEMS TO BE PRODUCED

1). Separately and distinctly a copy produced independently from any voting system of each original unique native ballots cast for all mail-in, absentee, and Uniformed and Overseas Citizens Absentee Voting Act methods and counted in the November 3, 2020 General Election in Fulton County, Georgia containing:

- a) a resolution of at least 600 DPI in 16 bit color in TIFF image, or
- b) a resolution of at least 600 DPI in 16 bit color in JPG image.

2). Reports from the Dominion electronic election management system (EMS) for both the November 03, 2020 original count and the candidate requested machine recount, including:

- a) Dominion Electronic Cast Vote Record
- b) Vote-by-Mail Ballot Report
- c) Provisional Ballot Report
- d) Conditional Voter Registration Ballot Report
- e) Cast Vote Record (Raw data) - JSON
- f) ImageCast Central Logs
- g) Ballot Scanning/Tabulation Machine Logs
- h) Ballot Scanning/Tabulation Machine Tapes
- i) Ranked-Choice Voting: Board of Supervisors, Final Detailed Report
- j) Data Translator Spreadsheet
- k) Batches Loaded Reports

These systems generated reports should be provided as (a) an XML file, or (b) a JSON file, or (c) a TXT file, or (d) XLS file.

3). Produce for inspection and scanning each and every envelope that contained each and every mail-in ballot, absentee ballot, and Overseas Citizens Absentee Voting Act ballot that was counted, audited, or recounted in the November 3, 2020 General Election in Fulton County, Georgia.

4). Produce a copy in 600 DPI in 16 bit color of each and every absentee ballot application form, including those submitted electronically, by mail, in-person, and in-person for Advance Voting.

5). Forensic images, in EnCase format, of each of the following objects used in connection with the November 2020 Election:

- a) All drives attached to or affiliated with an EMS Server,
- b) All drives attached to or affiliated with any workstation used as an EMS Client,
- c) All drives attached to or affiliated with any ImageCast Central Workstations,
- d) All drives attached to or affiliated with any Adjudication Workstations,
- e) All drives attached to or affiliated with the controlling computer for any ballot scanner such as HiPro, Canon, etc.,
- f) All drives attached to or affiliated with any device used in conjunction with the election as a communications server or virtual private network server/concentrator,
- g) All SD Cards, USB Drives or other storage devices that were inserted into or removed from all tabulators, ballot marking devices or other device that were used for the tabulation of votes,
- h) All ImageCast X, ImageCast Precinct, and ImageCast Central devices,
- i) All KNOWiNK electronic Poll Pads (including technicians' version)
- j) All laptop computers used to facilitate voter check-ins, and
- k) All (255) laptop computers distributed and/or assigned to Election Day ACLU Registrars.

6). The following electronic files: a. Forensic copies of all slog.txt files and .dvd files generated from tabulators and ballot marking devices and b. Forensic copies of all data items related to the November 2020 Election subject to the 22 month voter records retention requirement under U.S. federal law.

7). The following information related to electronic election system architecture:

- a) A network diagram including all devices, mac addresses and assigned IP addresses for Your complete electronic election system, including but not limited to the EMS Server, all networked devices on the EMS Server network (routers, switches, communications servers, modems, etc), and all devices attached to the resident network for the voter registration server,
- b) For each ballot marking device, ballot scanner, and tabulator, the media access control (MAC) address for each communication device connected to the ballot

marking device, ballot scanner, or tabulator at any time between January 1, 2019 and November 30, 2020,

- c) Copies of all network logs, PCAPs, netflow data and access control logs from networking devices associated with the EMS,
 - d) Credentials to permit access through all whole disk or file encryption technologies utilized in any part of your electronic election system that is produced in response to this subpoena, including but not limited to BitLocker, TrueCrypt, and VeraCrypt technologies,
 - e) A list of all personnel who had access to the EMS Server or any EMS server connected computing device for the period January 1, 2019 through November 30, 2020, and
 - f) Provide the name of the person, the account utilized, the devices accessed and the duration of the access.
- 8). The following information related to the results of the November 2020 Election:
- a) Copies of all tabulator poll closing reports and tabulator reports generated by each precinct and polling location, detailing with date and time the number of in person voters, the number of same day voter registrations (if applicable), and the final totals for the precinct,
 - b) Copies of the certified final election results that were used to determine the official outcomes of the election contests, and
 - c) Copies of any document, report, or spreadsheet that was produced in relation to the November 2020 Election,
 - d) Copies of all tabulator poll tapes (signed/certified and unsigned), including the poll open or zero tape, status tape(s), and poll closing tape for every tabulator and tabulator ID,
 - e) Copies of all Scanner and Ballot Recap Sheets for all polling locations for all types of voting,
 - f) Copies of all voter check-in lists for all polling locations for all types of voting,
 - g) Copies of all email correspondence between Ryan Macias and any Fulton County employee,
 - h) Copies of all email correspondence between anyone working with/on behalf of

the Elections Group (including Jennifer Morrell, Noah Perez, and Ryan Macias) and any Fulton County employee or election official,

- i) Copies of all ballot images and the corresponding SHA hash authentication file for each image scanned at State Farm Arena for the 2020 General Election (Please provide the electronic files in a .zip file so as to preserve file metadata),
 - j) Copy of the "Not Cast Images" folder and the problem ballot images for each ImageCast Central tabulator and additional/virtual instance thereof as identified by Tabulator ID,
 - k) List of all individuals and entities that were not county-contracted vendors/employed by Fulton County (including the Elections Group, U.S. Digital Response, etc.) who physically and/or electronically accessed voting equipment (including any tabulators, servers, workstations, Ballot Marking Devices (BMD), poll pads, etc.),
 - l) Provide any contract, agreement, or document providing authorization, and the corresponding resolution adopted by the Fulton County Board of Registration and Elections (BRE) for those described in item "l".
 - m) Provide an itemized inventory of all election equipment, including serial numbers, used for the 2020 General Election,
 - n) Provide the recordings and transcripts for all interviews of the five individuals who scanned absentee ballots on the evening of November 3rd at State Farm Arena, and
 - o) Provide all ballot signature envelope images.
 - p) Copies of all invoices for Runbeck Election Services, Fidlar, and Cathedral Printing.
- 9). All documents related to any indication of any intrusion attempt into Your electronic election system.
- 10). Copies of all cellular bills and connections supporting Your ballot scanners and ballot marking devices. These records should include the International Mobile Equipment Identity (IMEI) number, Temporary Mobile Subscriber Identity (TMSI) number, originating phone number, destination phone number, date and time of call origination, and call duration.
- 11). Copies of all contracts and agreements with the suppliers of any of Your electronic

election system equipment, devices, software, or support services.

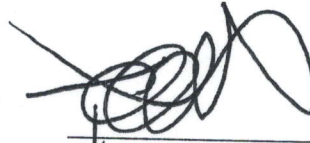
12). Copies of all contracts and agreements related to network security, network monitoring, or cybersecurity concerning all or any part of Your electronic election system.

13). All drives attached to or affiliated with any Mobile Device Management (MDM) server, Meraki server and affiliated or attached cache device(s).

HEREIN FAIL NOT, under the penalty of Law and Contempt of said Court, this the 11th day of September, 2023.

Respectfully submitted this the 11th day of September, 2023.

HARDING LAW FIRM, LLC



Todd Harding, For the Firm
Ga. Bar No.: 101562
Attorney for Harrison Floyd

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

STATE OF GEORGIA,)	
)	
vs.)	Case No. <u>23SC188947</u>
)	
HARRISON FLOYD)	
)	
DEFENDANT.)	

SUBPOENA DUCES TECUM

TO: RETURN RECEIPT REQUESTED NO.: 7022 1670 0001 8142 2845
Che' Alexander
Clerk of Fulton County Superior Court
136 Pryor Street, SW
Suite J2-640
Atlanta, Georgia 30303

YOU ARE HEREBY COMMANDED:

That laying all other business aside, you are commanded to be at and appear at the Harding Law Firm, LLC located at: 113 E. Solomon Street, Griffin, Georgia 30223, on October 16, 2023, at 9:00 a.m., and to bring with you into said law firm certain matters to be used as evidence in the matter of: **State of Georgia v. Harrison Floyd, Fulton County State Court Case No.: 23SC188947.**

You are required to produce any and all unredacted and unedited original items listed below that are in your possession or are under Your custody or control pursuant to Code Ann. §24-13-23:

DEFINITIONS

1. "Adjudication" refers to the process of reviewing a voter's ballot to determine what votes were intended by the voter who cast the ballot.
2. "Ballot marking device" refers to any electronic device used to complete an electronic ballot which is then printed onto paper.
3. "Ballot scanner" refers to an electronic device that provides optical scanning of ballots to produce a digital image of the ballot and/or to read the votes marked on the ballot.
4. "Client" refers to a computer that connects to a computer server.
5. "Controlling computer" refers to a computer connected to another electronic device, that is

- used to control the behavior of the connected electronic device.
6. "Document" refers to any writing or electronically stored information stored in any medium from which information can be obtained, including drawings, graphs, charts, photographs, sound recordings, video recordings, images, or other data or data compilations.
 7. "Drive" or "drives" refers to any medium for the storage of electronic or digital data.
 8. "EMS" refers to an Election Management System or any set of electronic equipment used to facilitate the counting, tabulation, and reporting of results in a public election.
 9. "Electronic election system" refers to all electronic or computerized devices and equipment used to cast ballots, count votes, tabulate votes, or report results in an election.
 10. "EnCase" refers to the digital forensic data collection and investigation technology produced by Guidance Software.
 11. "Forensic copy" refers to a file-level exact duplication of electronic data.
 12. "Forensic image" refers to a bit-by-bit, sector-by-sector direct copy of a physical storage devices containing electronic data, including all files, folders and unallocated, free, and slack space.
 13. "ImageCast Central" or "ICC" refers to the electronic system distributed by Dominion Voting with that name.
 14. "ImageCast Evolution" or "ICE" refers to the electronic device distributed by Dominion Voting, with that name, that can be used as a ballot marking device and tabulator. 2
 15. "ImageCast Precinct" or "ICP" refers to the electronic device distributed by Dominion Voting, with that name, that can optically scan and tabulate votes from paper ballots.
 16. "ImageCast X" or "ICX" refers to the electronic device distributed by Dominion Voting, with that name, that can be used as a ballot marking device.
 17. "November 2020 Election" refers to the general election in the United States for which Election Day was November 3, 2020.
 18. "Server" refers to a computer server or computer that stores, processes, and manages data for other computers or devices on a computer network.
 19. "Storage device" refers to any medium for the storage of electronic or digital data.
 20. "Tabulator" refers to any electronic device used to count or tabulate votes from paper ballots.
 21. "Workstation" refers to an individual computer, which may or may not be connected to a computer network, used to facilitate one or more specific tasks or processes.

22. "You" and "Your" refer to the recipient of this subpoena.

ITEMS TO BE PRODUCED

1). Separately and distinctly a copy produced independently from any voting system of each original unique native ballots cast for all mail-in, absentee, and Uniformed and Overseas Citizens Absentee Voting Act methods and counted in the November 3, 2020 General Election in Fulton County, Georgia containing:

- a) a resolution of at least 600 DPI in 16 bit color in TIFF image, or
- b) a resolution of at least 600 DPI in 16 bit color in JPG image.

2). Reports from the Dominion electronic election management system (EMS) for both the November 03, 2020 original count and the candidate requested machine recount, including:

- a) Dominion Electronic Cast Vote Record
- b) Vote-by-Mail Ballot Report
- c) Provisional Ballot Report
- d) Conditional Voter Registration Ballot Report
- e) Cast Vote Record (Raw data) - JSON
- f) ImageCast Central Logs
- g) Ballot Scanning/Tabulation Machine Logs
- h) Ballot Scanning/Tabulation Machine Tapes
- i) Ranked-Choice Voting: Board of Supervisors, Final Detailed Report
- j) Data Translator Spreadsheet
- k) Batches Loaded Reports

These systems generated reports should be provided as (a) an XML file, or (b) a JSON file, or (c) a TXT file, or (d) XLS file.

3). Produce for inspection and scanning each and every envelope that contained each and every mail-in ballot, absentee ballot, and Overseas Citizens Absentee Voting Act ballot that was counted, audited, or recounted in the November 3, 2020 General Election in Fulton County, Georgia.

4). Produce a copy in 600 DPI in 16 bit color of each and every absentee ballot application form, including those submitted electronically, by mail, in-person, and in-person for Advance Voting.

5). Forensic images, in EnCase format, of each of the following objects used in connection with the November 2020 Election:

- a) All drives attached to or affiliated with an EMS Server,
- b) All drives attached to or affiliated with any workstation used as an EMS Client,
- c) All drives attached to or affiliated with any ImageCast Central Workstations,
- d) All drives attached to or affiliated with any Adjudication Workstations,
- e) All drives attached to or affiliated with the controlling computer for any ballot scanner such as HiPro, Canon, etc.,
- f) All drives attached to or affiliated with any device used in conjunction with the election as a communications server or virtual private network server/concentrator,
- g) All SD Cards, USB Drives or other storage devices that were inserted into or removed from all tabulators, ballot marking devices or other device that were used for the tabulation of votes,
- h) All ImageCast X, ImageCast Precinct, and ImageCast Central devices,
- i) All KNOWiNK electronic Poll Pads (including technicians' version)
- j) All laptop computers used to facilitate voter check-ins, and
- k) All (255) laptop computers distributed and/or assigned to Election Day ACLU Registrars.

6). The following electronic files: a. Forensic copies of all slog.txt files and .dvd files generated from tabulators and ballot marking devices and b. Forensic copies of all data items related to the November 2020 Election subject to the 22 month voter records retention requirement under U.S. federal law.

7). The following information related to electronic election system architecture:

- a) A network diagram including all devices, mac addresses and assigned IP addresses for Your complete electronic election system, including but not limited to the EMS Server, all networked devices on the EMS Server network (routers, switches, communications servers, modems, etc), and all devices attached to the resident network for the voter registration server,
- b) For each ballot marking device, ballot scanner, and tabulator, the media access control (MAC) address for each communication device connected to the ballot

marking device, ballot scanner, or tabulator at any time between January 1, 2019 and November 30, 2020,

- c) Copies of all network logs, PCAPs, netflow data and access control logs from networking devices associated with the EMS,
 - d) Credentials to permit access through all whole disk or file encryption technologies utilized in any part of your electronic election system that is produced in response to this subpoena, including but not limited to BitLocker, TrueCrypt, and VeraCrypt technologies,
 - e) A list of all personnel who had access to the EMS Server or any EMS server connected computing device for the period January 1, 2019 through November 30, 2020, and
 - f) Provide the name of the person, the account utilized, the devices accessed and the duration of the access.
- 8). The following information related to the results of the November 2020 Election:
- a) Copies of all tabulator poll closing reports and tabulator reports generated by each precinct and polling location, detailing with date and time the number of in person voters, the number of same day voter registrations (if applicable), and the final totals for the precinct,
 - b) Copies of the certified final election results that were used to determine the official outcomes of the election contests, and
 - c) Copies of any document, report, or spreadsheet that was produced in relation to the November 2020 Election,
 - d) Copies of all tabulator poll tapes (signed/certified and unsigned), including the poll open or zero tape, status tape(s), and poll closing tape for every tabulator and tabulator ID,
 - e) Copies of all Scanner and Ballot Recap Sheets for all polling locations for all types of voting,
 - f) Copies of all voter check-in lists for all polling locations for all types of voting,
 - g) Copies of all email correspondence between Ryan Macias and any Fulton County employee,
 - h) Copies of all email correspondence between anyone working with/on behalf of

the Elections Group (including Jennifer Morrell, Noah Perez, and Ryan Macias) and any Fulton County employee or election official,

- i) Copies of all ballot images and the corresponding SHA hash authentication file for each image scanned at State Farm Arena for the 2020 General Election (Please provide the electronic files in a .zip file so as to preserve file metadata),
 - j) Copy of the "Not Cast Images" folder and the problem ballot images for each ImageCast Central tabulator and additional/virtual instance thereof as identified by Tabulator ID,
 - k) List of all individuals and entities that were not county-contracted vendors/employed by Fulton County (including the Elections Group, U.S. Digital Response, etc.) who physically and/or electronically accessed voting equipment (including any tabulators, servers, workstations, Ballot Marking Devices (BMD), poll pads, etc.),
 - l) Provide any contract, agreement, or document providing authorization, and the corresponding resolution adopted by the Fulton County Board of Registration and Elections (BRE) for those described in item "l".
 - m) Provide an itemized inventory of all election equipment, including serial numbers, used for the 2020 General Election,
 - n) Provide the recordings and transcripts for all interviews of the five individuals who scanned absentee ballots on the evening of November 3rd at State Farm Arena, and
 - o) Provide all ballot signature envelope images.
 - p) Copies of all invoices for Runbeck Election Services, Fidlar, and Cathedral Printing.
- 9). All documents related to any indication of any intrusion attempt into Your electronic election system.
- 10). Copies of all cellular bills and connections supporting Your ballot scanners and ballot marking devices. These records should include the International Mobile Equipment Identity (IEMI) number, Temporary Mobile Subscriber Identity (TMSI) number, originating phone number, destination phone number, date and time of call origination, and call duration.
- 11). Copies of all contracts and agreements with the suppliers of any of Your electronic

election system equipment, devices, software, or support services.

12). Copies of all contracts and agreements related to network security, network monitoring, or cybersecurity concerning all or any part of Your electronic election system.

13). All drives attached to or affiliated with any Mobile Device Management (MDM) server, Meraki server and affiliated or attached cache device(s).

HEREIN FAIL NOT, under the penalty of Law and Contempt of said Court, this the 11th day of September, 2023.

Respectfully submitted this the 11th day of September, 2023.

HARDING LAW FIRM, LLC

A handwritten signature in black ink, appearing to read 'Todd Harding', is written over a horizontal line.

Todd Harding, For the Firm
Ga. Bar No.: 101562
Attorney for Harrison Floyd

Harding Law Firm, LLC
Attorneys at Law
113 E. Solomon Street
Griffin, Georgia 30223
(770) 229-4578
(770) 288-9111 facsimile