

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**ASSOCIATION OF COMMUNITY )  
ORGANIZATIONS FOR REFORM )  
NOW, et al., )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
CATHY COX, et al., )  
 )  
Defendants. )**

**CIVIL ACTION NO.  
1:06-CV-1891-JTC**

**GOOD FAITH CERTIFICATE OF COUNSEL**

COMES NOW STEFAN RITTER, as counsel of record for KAREN HANDEL, Defendant herein in her official capacity as the Secretary of State of Georgia, and CLAUD L. (“TEX”) MCIVER III, J. RANDOLPH EVANS, DAVID J. WORLEY and JEFFREY K. ISRAEL, Defendants herein in their official and individual capacities, and CATHY COX, Defendant herein in her individual capacity, and states upon his own personal knowledge and in compliance with LR 37.1 NDGa., as follows:

1.

My name is Stefan Ritter, and I am counsel of record for KAREN HANDEL, Defendant herein in her official capacity as the Secretary of State of

Georgia, and CLAUD L. (“TEX”) MCIVER III, J. RANDOLPH EVANS, DAVID J. WORLEY and JEFFREY K. ISRAEL, Defendants herein in their official and individual capacities, and CATHY COX, Defendant herein in her individual capacity in the above-styled action. This certificate is made upon my own personal knowledge and the actions described herein were performed by me in my capacity as his counsel.

2.

I hereby certify that I have tried extensively and at length to resolve the discovery disputes in the above styled case without resorting to action by the Court. My efforts have included one lengthy letter, numerous emails, and numerous telephone calls. Pursuant to the Local Rules of this court I am not attaching this correspondence to this certificate. My efforts have also included attempts to set up depositions and to have the discovery issues and disputes between counsel addressed by the court informally, all of which have been rebuffed. The interrogatory response Defendants have received have never been verified despite requests they be verified. Plaintiffs’ counsel attempted to contact me via email the day his clients document requests were due; I was not in the office at that time. I later told him I would agree to response in forty days from the due date if all responsive documents were received by me at that time via hand

delivery. No documents were so delivered. Only five documents (training manuals) have been produced so far. No written Rule 29 extension was ever made by the parties.

Respectfully submitted,

/s/Stefan Ritter  
STEFAN RITTER 606950  
Senior Assistant Attorney General

Office of the Attorney General  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334-1300  
(404) 656-3330

**SIGNATURE CERTIFICATION**

I certify that the originally executed document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.

/s/Stefan Ritter  
STEFAN RITTER 606950  
Senior Assistant Attorney General

40 Capitol Square, S.W.  
Atlanta, Georgia 30334-1300  
Telephone: (404) 656-4666  
Fax: (404) 657-9932  
E-mail: stefan.ritter@law.state.ga.us

**CERTIFICATE OF SERVICE**

I do hereby certify that I have this day served the within and foregoing  
**GOOD FAITH CERTIFICATE OF COUNSEL** with the Clerk of Court using  
the CM/ECF system, which will send notification of filing to the following  
CM/ECF participants:

Bradley Heard, Esq.  
[bheard@moldenholley.com](mailto:bheard@moldenholley.com)

Brian W. Mellor, Esq.  
[electioncounsel1@projectvote.org](mailto:electioncounsel1@projectvote.org)

Elizabeth S. Westfall, Esq.  
[ewestfall@advancementproject.org](mailto:ewestfall@advancementproject.org)

This 4th day of June, 2007.

/s/Stefan Ritter  
STEFAN RITTER  
Georgia Bar No. 606950  
Attorney for Defendants