

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.
v.)	
)	2:06-CV-00392-WKW
STATE OF ALABAMA, et al.,)	
)	
Defendants.)	

SUPPLEMENTAL RESPONSE TO ORDER TO PRODUCE DOCUMENTS

COMES NOW Nancy L. Worley in her capacity as Secretary of State of Alabama, by and through her attorneys, and files the following Response to this Court's Order dated November 17, 2006, requiring her to produce documents no later than Wednesday, November 22, 2006, and states as follows:

1. Counsel for Secretary of State Nancy L. Worley (Worley) coordinated with counsel for the Special Master for the purpose of locating and securing HAVA documents. Computer technician, Anthony Powell, retrieved any electronic documents or computer-generated documents relating to HAVA and produced one CD to counsel for the Special Master on Wednesday, November 22, 2006. Counsel for the Special Master and Secretary of State agreed that Anthony Powell would review e-mails from the computer of Trey Granger for any HAVA-related communications, and that the Secretary of State would produce any HAVA-related e-mail

correspondences via CD and hard copy no later than Tuesday, November 28, 2006.

2. On Tuesday, November 28, 2006, counsel for the Special Master, Ken Wallis, informed counsel for the Secretary of State that the production of hard copies of information contained on the CD was unnecessary and that production of the CD of e-mails from the computer of Trey Granger would suffice. Counsel for the Secretary of State did not view contents of the CD.

3. The CD containing HAVA-related e-mails was produced to counsel for the Special Master on November 28, 2006.

4. Counsel for the Secretary of State and counsel for the Special Master continue to coordinate efforts to fully comply with production requests.

Respectfully submitted this the 28th day of November, 2006.

Capell & Howard, P.C.

By: /s/ George L. Beck, Jr.
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CERTIFICATE OF SERVICE

This is to certify that on the 28th day of November, 2006, a copy of the foregoing has been electronically filed with the Clerk of the Court using the CM/ECF system, which will electronically send a copy of the same to the following:

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