

**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**

**SECRETARY OF STATE’S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
TO GEORGIA COALITION FOR THE PEOPLE’S AGENDA**

COMES NOW the SECRETARY OF STATE OF THE STATE OF  
GEORGIA, Defendant herein in her official capacity, and, pursuant to Fed. R. Civ.  
Proc. 34 and 37, makes these requests for production of documents to Plaintiff  
Georgia Coalition for the People’s Agenda (hereinafter “GCPA” or “you”).

**INSTRUCTIONS**

The documents requested below should be delivered to the Defendants’  
counsel within 30 days of the date of this request. These requests apply to drafts as  
well as final versions of documents; if you have drafts and final versions of a  
document, you should produce both. The word “document” is used in these

requests in its broadest sense to mean all kinds of documents, whether printed, copied, handwritten, or stored on any type of electronic media (including a computer, such as email). The documents produced should be separated into marked groups so that it is possible to discern which request they respond to. The documents may be “Bates” numbered at your discretion (or as agreed upon by counsel) as long as the material on the documents is not obliterated by the Bates numbers; Bates numbering will allow you to produce the documents with a list identifying the documents by numbered pages are responsive to each request.

## **REQUESTS**

Please produce for inspection and copying the following (and if no documents are available in response to the request please so state):

1.

Copies of voter registration applications made or collected by GCPA for persons registering to vote in Georgia after September 2006.

2.

Copies of voter registration applications made or collected by GCPA for persons registering to vote in Georgia between September 30, 2004 and September 30, 2006.

3.

All sign-in sheets, logs, or registers made or used at “voter registration drives”(as that phrase is used in the Complaint) that were conducted by you in 2004, 2005 or 2006.

4.

All grant applications, applications for financial assistance, or documents showing an award of a grant or financial assistance to GCPA for it to conduct voter registration drives in Georgia at any time during the years 2004, 2005, and or 2006.

5.

All letters and emails, and all enclosures to those documents, exchanged between employees, volunteers or officers of GCPA and Project Vote and/or Project Vote/Voting for America, Inc. (“Project Vote”) in 2004, 2005, and 2006 which concerned or related to voter registration activities or programs in Georgia.

6.

All letters and emails, and all enclosures to those documents, exchanged between employees, volunteers or officers of GCPA and Working Assets and/or Working Assets, Inc. and/or Michael Kleschnick in 2004, 2005, and 2006 which concerned or related to voter registration activities or programs in Georgia.

7.

All letters and emails, and all enclosures to those documents, exchanged between employees, volunteers or officers of GCPA and Proteus Fund and/or Margaret Gage in 2004, 2005, and 2006 which concerned or related to voter registration activities or programs in Georgia.

8

All handouts, flyers, or advertisements for “voter registration drives” (as that phrase is used in the Complaint) held in 2004, 2005 or 2006.

9.

All documents (except those that may be pleadings in the present case) related to, discussing, describing, or advertising GCPA’s voter registration activities in Georgia in 2005, and 2006.

10.

Any contract, letter, or memorandum of representation between GCPA and Brad Heard. To the extent any litigation work product or attorney-client privileged communications exist in such a document, they may be redacted.

11.

All documents used for or concerning the training of volunteers, employees, or officers of GCPA to conduct “voter registration drives,” or to process, transmit,

copy, safeguard, or follow-up on voter registration applications.

12.

Copies of all complaints that have been made against or received by GCPA relating to voter registration activities between 2004 to 2006.

Respectfully submitted,

THURBERT BAKER                      033887  
Attorney General

DENNIS DUNN                              269350  
Deputy Attorney General

/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

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**CERTIFICATE OF SERVICE**

I do hereby certify that I have this day served the within and foregoing **SECRETARY OF STATE'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO GEORGIA COALITION FOR THE PEOPLE'S AGENDA** with the Clerk of Court using the CM/ECF system, which will send notification of filing to the following CM/ECF participant:

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

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

A printed copy of the foregoing document has been sent via United States mail, first class postage prepaid to Plaintiffs' counsel:

Bradley E. Heard  
Molden Holley Fergusson Thompson & Heard  
One Park Tower  
34 Peachtree Street, NW, Suite 1700  
Atlanta, Georgia 30303-4501

This 12th day of January, 2007.

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