

**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
REGARDING INTERROGATORY VERIFICATIONS**

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 the above-named
Defendants 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.

Plaintiffs' interrogatory responses served on me, as counsel for the Defendants, were unverified. At no time have I been served with verifications until Plaintiffs purported to do so (without notice to me) when they filed a notice of filing their original discovery. The verifications were not identified in that document. Plaintiffs' amended discovery responses made on May 18, 2007, did not include verifications.

3.

I informed Plaintiffs' counsel, both orally and in writing, of the absence of the verifications and requested them. He told me, in writing that he would provide them at a later date but that he thought they were unnecessary since Plaintiffs objected to the interrogatory responses. I discovered the undated and improperly sworn verifications, of which I received no service or notice of filing, when I was preparing Defendants' Reply brief in support of their motion to compel. I fully adopt all prior certificates of counsel I have made in this case.

Stated under penalty of perjury this 9th day of July, 2007.

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

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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served the within and foregoing
GOOD FAITH CERTIFICATE OF COUNSEL REGARDING
INTERROGATORY VERIFICATIONS 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

Brian W. Mellor, Esq.
electioncounsel1@projectvote.org

Elizabeth S. Westfall, Esq.
ewestfall@advancementproject.org

This 9th day of July, 2007.

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