

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

GEORGIA STATE CONFERENCE OF THE)
NAACP, et al.)

Plaintiffs,

v.

STATE OF GEORGIA, et al.)

Defendants.

_____)
COMMON CAUSE, et al.,)

Plaintiffs,

v.

BRAD RAFFENSPERGER)

Defendant.

) Case No. 1:21-CV-5338-
) ELB-SCJ-SDG

) Case No. 1:22-CV-00090-
) ELB-SCJ-SDG

**NOTICE OF ERRATA TO ATTACHMENT F- 2 TO JOINT PRETRIAL
ORDER**

Plaintiffs Georgia State Conference of the NAACP, GALEO Latino Community Development Fund, Inc (GALEO), and Georgia Coalition for the People’s Agenda (GCPA) (hereinafter “Georgia NAACP Plaintiffs”), through their attorneys, file this Notice of Errata to Attachment F-2 to the Joint Pretrial Order. *See*

Dkt. No. 194. This Notice of Errata is filed to correct one inadvertent filing error that arose during the filing of materials at docket number 194.

Attachment F-2 of docket number 194 reflects the Georgia NAACP Plaintiffs proposed “Will Call” and “May Call” witness lists in connection with the Joint Pretrial Order.

The “Will Call” witness list for Georgia NAACP Plaintiffs inadvertently excludes one name (Helen Butler), despite the name being previously disclosed to Defendants. The Georgia NAACP Plaintiffs respectfully request that the Court replace Attachment F-2 of docket number 194 with **Exhibit A** to this Notice of Errata.

Dated: October 30, 2023

Respectfully submitted,

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LOCAL RULE 7.1(D) CERTIFICATION OF COMPLIANCE

I certify that this pleading has been prepared with Times New Roman font, 14 point, as approved by the Court in L.R. 5.1(C), N.D. Ga.

/s/ Kurt Kastorf
Kurt Kastorf (Georgia Bar No. 315315)
Attorney for Plaintiffs
Lawyers' Committee for Civil Rights Under Law

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GEORGIA STATE CONFERENCE OF)
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BRAD RAFFENSPERGER)

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Case No. 1:21-CV-5338-ELB-SCJ-SDG

Case No. 1:22-CV-00090-ELB-SCJ-SDG

JOINT PRETRIAL ORDER

CORRECTED ATTACHMENT F-2**GA NAACP Plaintiffs' Witness List**

The *GA NAACP* Plaintiffs anticipate that the following witnesses will testify at trial:

Witness	Previously Filed Report(s)/Declaration(s)¹
Dr. Moon Duchin	ECF Nos. 142-1; 142-2; 142-3; 142-4; 152-33; 152-39; 154-1; 154-2; 154-3; 154-4; 154-5 Topics: Expert Report dated 1-13-2023; Rebuttal Report dated 2-15-2023; Errata dated 4-26-2023.
Dr. Benjamin Schneer	ECF No. 152-36. Topics: Expert Report dated 1-12-2023; Errata dated 3-31-2023
Dr. Peyton McCrary	ECF No. 152-22 Topics: Expert Report dated 1-13-2023.
Dr. Joseph Bagley	ECF No. 152-23. Topics: Expert Report Dated 01-13-2023
Gerald Griggs	ECF No. 152-15 Testifying as fact witness.
Gerardo "Jerry" Gonzalez	ECF No. 152-16 Testifying as fact witness.
Helen Butler	ECF No. 152-17

¹ ECF numbers listed in Attachment F-2 cite to the docket of *Georgia State Conference of the NAACP v. State of Georgia*, No. 1:21-CV-5338-ELB-SCJ-SDG.

	Testifying as fact witness.
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The *GA NAACP* Plaintiffs anticipate that the following witnesses may testify at trial:

Witness	Previously Filed Report(s)/Declaration(s)
Dir. Gina Wright	N/A
David Dove	N/A
Cynthia “Cindy” Battles	N/A
Robert Strangia	N/A
Blake Evans	N/A
David Garcia	N/A
Former Lt. Gov Geoff Duncan	N/A
Ryan Germany	N/A
Sen. Mike Dugan	N/A
Barry Fleming	N/A
Sen. John Kennedy	Testifying as fact witness.
Rep. Bonnie Rich	Testifying as fact witness.
Rep Jan Jones	Testifying as fact witness.
Daniel O’Connor	Testifying as fact witness.