

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

DR. PAUL C. BROUN,  
SHERI GILLIGAN,  
AND VOTERGA,

Petitioners,

v.

STATE OF GEORGIA,

Respondent.

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Civil Action No. 2022CV361918

**RESPONDENT STATE OF GEORGIA’S OBJECTIONS TO  
PETITIONERS’ FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

The State of Georgia (the “State”), Respondent in the above-styled action, by and through its counsel, hereby serves its objections to Petitioners’ First Request for Production of Documents and Notice to Produce (the “Requests”).

**GENERAL OBJECTIONS**

The State generally objects to the Requests on the following grounds:

1. The State objects to the Requests to the extent that Petitioners are attempting to impose obligations upon the State beyond the requirements of the Georgia Civil Practice Act.
2. The State objects to the Requests to the extent that they are overly broad and are not reasonably calculated to lead to the discovery of admissible evidence.
3. The State objects to the Requests to the extent that they call for the production of documents not in the custody, control, or possession of the State.
4. The State objects to the Requests to the extent that they seek information that is proprietary, confidential, or which constitutes trade secrets.

5. The State objects to the Requests to the extent that they seek information that is not relevant to the claims in the Petition for Declaratory Judgment and Injunctive Relief (the “Petition”), through which Petitioners’ sole basis for seeking relief is their assertion that the storage of voter registration data on a third-party server is in violation of state law.

#### OBJECTIONS TO SPECIFIC REQUESTS

**Request No. 1: Please produce copies of all contracts, supplements, software licensing agreements, and work orders executed by the State of Georgia with Carahsoft, SalesForce, MTX, and any other third parties employed under the direction of any Masters Solutions Agreement.**

Response to Request No. 1: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information regarding “any” Masters Solution Agreement. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation.

**Request No. 2: Please produce copies of all contracts, supplements, software licensing agreements, and work orders executed by the State of Georgia with David Decker and the Center for Elections Innovation and Research (CEIR).**

Response to Request No. 2: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The

State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation.

**Request No. 3: Please produce copies of all system documentation, implementation plans, and test results for the GARVIS system.**

Response to Request No. 3: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition.

**Request No. 4: Please produce all email communications between the Office of the Secretary of State and all employees or agents of the Center for Election Innovation and Research.**

Response to Request No. 4: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks

documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties.

**Request No. 5: Please produce copies of all email communications between the Office of the Secretary of State and all counties involving GARVIS pilots.**

Response to Request No. 5: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition.

**Request No. 6: Please produce copies of all email communications between the Office of the Secretary of State and all parties representing Runbeck Election Services.**

Response to Request No. 6: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties.

**Request No. 7: Please produce copies of all contracts, supplements, and work orders executed by the State of Georgia with the Center for Innovation Research (CEIR) and any other third parties engaged with CEIR activities.**

Response to Request No. 7: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties.

**Request No. 8: Please produce copies of all contracts, supplements, and work orders executed by the State of Georgia with the Electronic Registration and Information Center for Innovation Research (CEIR) and any other third parties engaged with ERIC activities.**

Response to Request No. 8: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties.

**Request No. 9: Please produce a copy of a complete list of all ERIC subcontractors, partners, and organizations who had access to Georgia residents' data.**

Response to Request No. 9: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter

registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties.

**Request No. 10: Please produce copies of any engineering change orders and related documentation for hardware, software, or firmware used for voter registration or voter verification purposes.**

Response to Request No. 10: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition.

**Request No. 11: Please produce copies of all contracts and supplements executed by the State of Georgia with KnowInk.**

Response to Request No. 11: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation.

**Request No. 12: Please produce copies of all agreements, invoices, or communications with KnowInk or third party vendors regarding KnowInk poll pad connectivity.**

Response to Request No. 12: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in

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**Request No. 13: Please produce copies of all documents representing any agreements signed with the Center for Technology and Civic Life (CTCL) or organizations funded by CTCL including U.S. Digital Response and Elections Group.**

Response to Request No. 13: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation.

**Request No. 14: Please produce a copy of the state certifications for the Dominion Voting System components and KnowInk Poll Pad components.**

Response to Request No. 14: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation.

**Request No. 15: Please produce all certifications by the Elections Assistance Commission for the KnowInk Poll Pad system.**

Response to Request No. 15: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks

documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation.

**Request No. 16: Please produce a sample file showing all data fields transferred to Runbeck for absentee ballot printing and mailing and records of all data transfers of absentee data to Runbeck, to include date, time, method of transmission, and number.**

Response to Request No. 16: The State incorporates herein by reference General Objections 1, 2, 3, 4, and 5. The State further objects to this Request because it is overbroad, vague, unduly burdensome, and seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The State also objects to this Request to the extent it seeks information that is proprietary, confidential, or which constitutes trade secrets. The State further objects to this Request to the extent that it seeks information that is maintained by or in the possession of third parties. Petitioners are seeking a declaratory judgment and injunctive relief barring use of the GARVIS system because they allege in the Petition that the storage of voter registration data on a third-party server is in violation of state law. The documents which Petitioners seek through this Request are irrelevant to the purely legal questions at issue in the Petition. Furthermore, this Request is not reasonably tailored to seek documents and information relating to the subject matter of the Petition, insofar as it seeks documents and information that are outside the scope of the allegations made in the Petition. The State also objects to this Request to the extent that it is not limited to the time period relevant to this litigation.

Respectfully submitted this 12th day of December, 2022.

CHRISTOPHER CARR 112505

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served upon Petitioners via their counsel of record a true and correct copy of the foregoing **RESPONDENT’S OBJECTIONS TO PETITIONERS’ FIRST REQUEST FOR PRODUCTION OF DOCUMENTS** by email and by regular U.S. mail as follows:

Todd A. Harding  
Harding Law Firm, LLC  
113 E. Solomon Street  
Griffin, GA 30223  
Email: kamikazehitman@comcast.net

*Counsel for Petitioners*

I further hereby certify that I am filing the certificate required by Rule 5.2(2) of the Uniform Rules of Superior Courts through the Odyssey e-filing system, which will send notification of such filing to all parties of record via electronic notification.

Dated: December 12, 2022.

/s/ Elizabeth Vaughan  
ELIZABETH VAUGHAN 762715  
Assistant Attorney General

*Counsel for Respondent*