

**From:** [Brian Lake](#)  
**To:** [Jeanne Mirer](#)  
**Cc:** [Josh Belinfante](#)  
**Subject:** RE: Palast et al v Crittenden  
**Date:** Monday, March 18, 2019 9:23:34 AM  
**Attachments:** [image001.jpg](#)

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Jeanne,

Contained in the dropbox link below are Confirmation Notice Report spreadsheets from 2013 – 2018. The lists are up to date as of this month.

<https://www.dropbox.com/sh/xt96iyw0trdzkuz/AAD4wNq5uZgnUeGumJPk48ofa?dl=0>

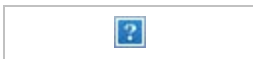
These reports show, for each person who was sent a confirmation notice, the following information:

- \* When the notice was sent;
- \* The type of notice (i.e., National-Change-Of-Address, Returned Mail, No Contact);
- \* The current status of the registration
- \* The last date the person voted; and
- \* The response from the elector (if any)

In 2013, the Secretary's office transitioned to a new voter registration system and, therefore, the data is only available from the new system beginning in mid-2013. However, this still includes all information from the "No Contact" confirmation notices sent in 2013 as they were sent in the latter half of that year.

We have confirmed that the Secretary's office does not have copies of the NCOA and No Contact confirmation notices sent by the counties prior to 2015.

We believe these documents cover the data you have requested. If you have additional questions or concerns, please let us know.



Brian E. Lake

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**From:** Jeanne Mirer [mailto:jmirer@mmsjlaw.com]

**Sent:** Thursday, February 28, 2019 2:38 PM

**To:** Brian Lake <Brian.Lake@robbinsfirm.com>

**Subject:** Palast et al v Crittenden

Dear Mr. Lake:

This letter memorializes our discussion on February 21, 2019. [REDACTED]

[REDACTED] I told you that we had modified our position somewhat on what we needed to resolve the case, to wit we were no longer seeking the Cross Check lists from 2016 and 2017 but needed the confirmation information which resulted in the removal of voters from the voter rolls in 2016 and 2017. I also told you that Ryan Germany stated this information was available and there was a willingness to provide it. Because we did not agree then about the Crosscheck lists, he did not provide the confirmation information.

You asked that I put our request in writing, and you would treat it as a request for production of document.

Plaintiffs request the following documents:

All confirmation notices which were sent to Georgia voters which resulted in their removal from the voter rolls in 2016 or 2017. (These would have been from at least 2013)

All documents showing the reason the confirmation notice was sent.

All documents which show the responses received as a result of the confirmation notices being sent.

As I told you, if you no longer have the postcards themselves I am sure you have the information requested in some electronic form which shows the list of people receiving cards and their responses if any. We would be willing to accept these verified lists which contain this information in electronic form.

[REDACTED]

Please get back to me as soon as possible regarding this.

Sincerely,

Jeanne Mirer

212 231 2235

