

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

US DOMINION, INC., DOMINION VOTING  
SYSTEMS, INC., and DOMINION VOTING  
SYSTEMS CORPORATION,

Plaintiffs,

v.

SIDNEY POWELL, SIDNEY POWELL, P.C.,  
and DEFENDING THE REPUBLIC, INC.,

Defendants.

Civil Action No. 1:21-cv-00040-CJN

**COUNTER-PLAINTIFFS' OPPOSITION TO COUNTER-DEFENDANTS'**  
**MOTION TO DISMISS COUNTERCLAIM**

Pursuant to LCvR 7(b), defendants and counter-plaintiffs Sidney Powell, Sidney Powell, P.C., and Defending the Republic, Inc. (collectively, "Counter-Plaintiffs") respectfully oppose the motion to dismiss their counterclaim filed by plaintiffs and counter-defendants Dominion Voting Systems Corporation, U.S. Dominion, Inc., and Dominion Voting Systems, Inc., based on the accompanying Memorandum of Points and Authorities and exhibits. Counter-Plaintiffs respectfully request the opportunity for oral argument. A proposed order is attached.

Dated: December 15, 2021

Respectfully submitted,

Howard Kleinhendler  
N.Y. Bar No. 2657120, admitted *pro hac vice*  
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/s/ Lawrence J. Joseph  
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*Local Counsel for All Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of December 2021, I electronically filed the foregoing document—together with the accompanying proposed order, memorandum of law, and exhibits—with the Clerk of the Court using the CM/ECF system, which I understand to have caused service of the counsel for the parties.

/s/ Lawrence J. Joseph

Lawrence J. Joseph