

*Plaintiffs' Motion to Compel Compliance with Subpoena
to Produce Documents*

EXHIBIT 11

Bruce P.
Brown
Law

June 7, 2023

By Email

Jennifer Dorminey Herzog
Hall Booth Smith, P.C.
1564 King Road
Tifton, GA 31793

Re: Documents and Files on Misty Hampton's Laptop

Dear Jennifer:

I am writing to again demand production of documents and files responsive to our subpoenas that are located on Misty Hampton's laptop. You have repeatedly stated that Hampton did not use a laptop for her election duties. However, the security video that Coffee County belatedly produced shows Hampton routinely using her laptop for her election duties.

I have attached screen shots from the security video showing Hampton on February 22, 2021, walking in the election office with her laptop open, standing over her laptop at her desk, and working on her laptop at her desk in front of a lit light ring. This is clearly not the "old Toshiba laptop" that you referenced as the laptop that was found in storage.

Witnesses have also told us that Hampton used a laptop to create voter I.D. cards, took her laptop to polling places, where she used it to check voter rolls if questions arose, and routinely took the laptop to state and regional election officials' meetings. We understand that the laptop was generally kept at Hampton's desk at the elections office.

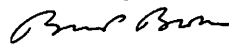
Plaintiffs' document subpoenas served on Coffee County require that the contents of computers be reviewed for responsive documents. It is essential that Coffee County produce all responsive documents from this laptop.

Ms. Jennifer D. Herzog
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Further, given the circumstances, we must also obtain a forensic image of the laptop and we will work out arrangements with you for an appropriate protocol for doing so. In the meantime, we request that Coffee County secure this laptop and fully and diligently search its contents for responsive records.

Please let me know if you have any questions or if you wish to discuss these issues.

Sincerely,



Bruce P. Brown

cc: Marilyn R. Marks
David Cross
Cary Ichter

