

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DR. SHIVA AYYADURAI,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN,
MICHELLE K. TASSINARI,
DEBRA O'MALLEY,
AMY COHEN,
NATIONAL ASSOCIATION OF
STATE ELECTION DIRECTORS,
all in their individual capacities, and
WILLIAM FRANCIS GALVIN,
in his official capacity as the Secretary
of the Commonwealth of Massachusetts,

Defendants.

Case No.: 1:20-cv-11889-MLW

AFFIDAVIT IN RESPONSE TO COURT'S AUGUST 4, 2021 ORDER

I, Dr. Shiva Ayyadurai, over 18 and competent to testify, and under the pains and penalties of perjury, hereby declare that I am the sole author of the Memorandum of Law. Michelle Jeffalone, Dilan Esper, John Medlar reviewed and provided feedback. The specifics of any communication that I may have had with any attorneys are protected by the attorney-client privilege.

Respectfully submitted under the pains and penalties of perjury,

/s/ Dr. Shiva Ayyadurai

Dr. Shiva Ayyadurai

Date: August 4, 2021 701 Concord Ave.

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