

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,  
Plaintiffs,**

v.

**Civil Action No. 1:17-CV-2989-AT**

**BRAD RAFFENSPERGER, ET AL.,  
Defendants.**

**LIMITED MOTION TO INTERVENE BY R. KYLE ARDOIN,  
in his official capacity as the LOUISIANA SECRETARY OF STATE**

Pursuant to Rule 24(b), the Louisiana Secretary of State, R. Kyle Ardoin, in his official capacity (the “LA Secretary of State”) respectfully moves to intervene for the limited purpose of seeking access to a report sealed in this litigation.

The Plaintiffs filed under seal a report by noted cybersecurity expert, Dr. J. Alex Halderman. *See* Doc. 1126 (referencing service of report); Doc. 1130-1 (filing of report under seal); Doc. 1130-2 ¶ 7 (acknowledging contents of report remains confidential). Based on public filings and statements by Dr. Halderman in his declarations, including direct references to Louisiana and its election equipment, it appears that the contents of Dr. Halderman’s report bear directly on the equipment currently used by the state of Louisiana for early voting.

The LA Secretary of State is the “chief election officer of the state.” La. Const. Art. 4 § 7. The information contained in Dr. Halderman’s sealed July 1, 2021. report appears to directly address the Dominion ICX machines Louisiana uses to conduct early voting in the state. As the chief election officer, the LA Secretary of State is obligated to investigate potential cybersecurity vulnerabilities with the Dominion ICX system, including those currently addressed in Dr. Halderman’s sealed report. The LA Secretary of State takes no other positions in this litigation and it does not otherwise seek to align with any of the parties or assert any claims or defenses.

In accordance with the procedures set forth by the Court, the LA Secretary of State seeks to intervene for the limited purpose of accessing Dr. Halderman’s report. The LA Secretary of State will agree to the terms of the Court’s Protective Order (Doc. 477) and take such other steps as are necessary to limit the review of this report, including limiting who may view it and maintaining custody of the report in accordance with the Protective Order. Wherefore, the LA Secretary of State requests that its Limited Motion to Intervene be granted.

Respectfully submitted,



---

Chad V. Theriot