

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

Kerrie Dickson, et al.,
Plaintiff,

v.

Secretary of State of Georgia, et al
Defendants

Civil Action #
2000-CV-27164

REQUEST FOR PRODUCTION OF DOCUMENTS

TO: The Honorable Cathy Cox, Georgia Secretary of State
c/o Elections Division; 1104 West Tower; Sloppy Floyd; Atlanta GA 30334

1. I herewith serve upon you the following request for production of documents under the provisions of §34 of the Georgia Civil Practice Act (O.C.G.A. §9-11-34).
2. You are requested to produce all documents hereinafter set forth which are relevant or reasonably calculated to lead to the discovery of admissible evidence at a mutually agreeable time within 31 days after service of this request and at a mutually agreed to place where facilities are available for proper copying and where I might use the most economical means available for reproduction.
3. You are requested to produce and to permit plaintiff to inspect and to copy each of the following documents and records, subject to all pertinent objections to admissibility which may be interposed at the trial:
 - a) all documents upon which you relied for each denial that you make to each of the foregoing requests for admissions;
 - b) all documents upon which you relied in answering the foregoing interrogatories;
 - c) a compilation and summary by year, which indicates, for each office governed by the Georgia Election Code or the Georgia Municipal Election Code, the total number of races, the number of partisan general elections which were contested, the number of partisan races contested by candidates not a nominee of the Democratic or Republican Parties and the percentage of total races contested by such candidates not a nominee of the Democratic or Republican Parties for every election held since the adoption of the Georgia Election Code and the Georgia Municipal Election Code;
 - d) the names, addresses, phone numbers and party affiliation of each candidate, not a nominee of the Democratic or Republican Parties who contested a partisan race summarized

in the report described in paragraph 3.c of this Request for Production of Documents;

e) a compilation and summary by year for each year since the adoption of the Georgia Election Code, which indicates, for all offices governed by the Georgia Election Code or the Georgia Municipal Election Code, the total number of independent candidates or independent political body candidates who filed a notice of candidacy required by O.C.G.A. 21-2-132(e) and who paid their qualifying fee or filed a pauper's affidavit as required by O.C.G.A. 21-2-132(f) or (g), the number of those candidates who filed a nominating petition as required by O.C.G.A. 21-2-132(d), the number of those candidates whose petitions were granted under the provisions of O.C.G.A. 21-2-171 and the number of those candidates whose petitions were denied under the provisions of O.C.G.A. 21-2-171, including the reasons for each such denial;

f) a list of those persons who signed a Nominating Petition to qualify plaintiff Kerrie Dickson as a Green Party candidate for House District 8 in 2000 whose signatures were not deemed valid upon the examination required by O.C.G.A. 21-2-170(b) including the reason for the invalidation of each such signature;

f) a list of those persons who signed a Nominating Petition to qualify plaintiff Kerrie Dickson as a Green Party candidate for House District 8 in 2000 whose signatures were deemed valid upon the examination required by O.C.G.A. 21-2-170(b).

4. Defendant Secretary of State has the possession, custody or control of each of the foregoing documents; each of them constitute or contain information relating to this action within the scope of §26(b) of the Georgia Civil Practice Act (O.C.G.A. § 9-11-26(b)) and plaintiff has good cause to move for production of same.

This _____ day of August 2000.

Kerrie Dickson, Plaintiff, pro-se
1426 Abe cove Rd; Hiawassee, Georgia 30546
800-447-6936 (voicemail)