

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**LEAGUE OF WOMEN VOTERS OF  
NEW HAMPSHIRE, *et al.*,**

Plaintiffs,

**STEVE KRAMER, *et al.*,**

Defendants.

Civil Action No. 1:24-cv-73-SM-TSM

**PLAINTIFFS' UNASSENTED-TO<sup>1</sup> MOTION FOR ENTRY  
OF DEFAULT AGAINST STEVE KRAMER PURSUANT TO RULE 55(a) AND  
MEMORANDUM IN SUPPORT THEREOF**

Plaintiffs, by and through counsel, hereby move the Clerk of the Court for an entry of default against Defendant Steve Kramer (“Kramer”). In support thereof, Plaintiffs include a memorandum of law and attach the Declaration of Joseph T. DiPiero, describing in detail the diligent and extensive efforts undertaken to date to serve Kramer, Kramer’s knowledge of and comments on the instant lawsuit, and Kramer’s failure to timely respond or otherwise appear in this matter.

**INTRODUCTION**

Defendant Kramer has made clear that he has no intentions of ever appearing in this action, despite Plaintiffs having successfully served him with both the Original Complaint and the First Amended Complaint (“Amended Complaint”), thereby putting him on notice of the action. The Summons served on Kramer with the Amended Complaint on July 8, 2024 expressly stated that a default judgment would be entered against him if he failed to respond within 21 days. Because more than 21 days have elapsed and Kramer still has not made any attempt to respond or otherwise

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<sup>1</sup> Plaintiffs attempted to contact Defendant Steve Kramer by phone to seek his assent to this motion, but he has not returned Plaintiffs’ calls or other communications.

appear in this case, an entry of default against Kramer must be entered by the Clerk of the Court under Federal Rule of Civil Procedure 55(a).

### **STATEMENT OF FACTS**

#### **I. Background on Instant Lawsuit and Defendant Steve Kramer**

On March 14, 2024, Plaintiffs commenced this action against Defendants Kramer, Lingo Telecom, LLC, and Life Corporation (collectively, the “Defendants”), alleging violations of the Voting Rights Act, the Telephone Consumer Protection Act, and New Hampshire Election Laws. *See* Complaint, ECF No. 1. The Complaint alleges that the Defendants generated and disseminated thousands of AI-generated robocalls to New Hampshire voters on the eve of the New Hampshire Presidential Primary (the “NH Robocalls”). *Id.* ¶ 2. The NH Robocalls used a deepfake of President Joe Biden’s voice and were spoofed to falsely reflect that they were coming from a phone number associated with the former Chair of the New Hampshire Democratic Party, Kathleen Sullivan. *Id.* ¶ 34. At the time, Sullivan was leading a public effort to ask voters to write-in President Joe Biden’s name in the primary. *Id.*

On March 14, the same day that this action was commenced, Kramer called Sullivan on her phone and accused her of being behind the instant lawsuit. *See* Declaration of Kathleen Sullivan, ECF No. 46-2 ¶ 22. On that call, Kramer provided Sullivan his contact information, including his email address and phone number. *Id.*

#### **II. Service of the Original Complaint on Steve Kramer**

On March 14, 2024, the Clerk issued a Summons to Kramer. *See* Summons, ECF No. 3. From March 15 to March 22, 2024, Plaintiffs unsuccessfully attempted to serve Kramer with the Complaint and Summons at multiple addresses in New York and Florida. *See* ECF No. 46-1 ¶¶ 6-7, 9.

On March 22, 2024, Plaintiffs learned from an associate of Kramer that Kramer lived at 2100 Napoleon Ave., New Orleans, LA (the “Louisiana Address”). *Id.* ¶ 10. From March 25 to 27, 2024, Plaintiffs made four attempts to serve Kramer at the Louisiana Address. *Id.* ¶¶ 11-13. During one attempt, a process server spoke to a man who identified himself as Kramer’s nephew. *Id.* ¶ 11. The individual stated that Kramer was not home and did not know when he would return. *Id.* ¶ 13. On March 27, 2024, a process server spoke with Kramer on the phone. *Id.* ¶ 14. Kramer indicated that he was in Europe and would not be returning to the United States until May 13, 2024. *Id.*

On April 3, 2024, a process server served the New Hampshire Secretary of State in accordance with the procedures set forth in RSA 510:4(II). *Id.* ¶ 15. That day, a notice of service on the New Hampshire Secretary of State, and a copy of process, was mailed to the Louisiana Address. *Id.* ¶ 16. On April 11, 2024, the United States Postal Service (“USPS”) attempted to deliver the package to the Louisiana Address. *Id.* ¶ 17. USPS left a notice on the door because an authorized recipient was unavailable. *Id.*

On April 17, Plaintiffs emailed a notice of service on the New Hampshire Secretary of State, and a copy of process to Kramer at the email address he previously provided to Sullivan. *Id.* ¶ 18. The following day, Plaintiffs filed a Motion for Alternative Service, seeking an order ratifying service on Kramer, or, in the alternative, allowing Plaintiffs to serve Kramer via alternative means. *See* ECF No. 46. While Plaintiffs’ Motion for Alternative Service was pending, on April 23, an online publication, CyberScoop, published an article about the instant lawsuit. *See* DiPiero Declaration in Support of Motion for Entry of Default (“DiPiero Decl.”), Exhibit A (CyberScoop Article). Per the article, a CyberScoop reporter spoke with Kramer on April 22,

2024. *Id.* During the call, Kramer stated that he had not seen the instant lawsuit, but yet also argued that the lawsuit was meritless. *Id.*

On April 24, 2024, U.S. Magistrate Judge Talesha L. Saint Marc denied without prejudice Plaintiffs' Motion for Alternative Service, concluding "[i]t is unclear at this point whether Mr. Kramer is attempting to evade service or whether, as Mr. Kramer stated during a telephone call with a process server, he is currently in Europe and not expected to return to the United States until May 13, 2024. Accordingly, the plaintiffs' motion is denied without prejudice to renewal if further efforts to serve Mr. Kramer at his last known address in New Orleans prove unsuccessful after his expected return. The plaintiffs shall have an additional 30 days, until July 12, 2024, to complete such service." *See* DiPiero Decl., Exhibit B (Docket Entry).

On April 25, 2024, a process server, Di Cong Jiang, spoke to Kramer on his cell phone. *See* DiPiero Decl., Exhibit C (Jiang Affidavit). Jiang explained he was a process server and that he had legal documents for Kramer. *Id.* Kramer stated that he was in the Netherlands working on a project for the government of Belgium. *Id.* Kramer initially stated that he might be back between April 28-30, but later indicated that he was returning on May 14. *Id.* Kramer asked what case Jiang was calling about. *Id.* Jiang responded that he was calling about the League of Women Voters case and asked whether Kramer would accept service upon his return. *Id.* Kramer did not provide a definitive answer. *Id.* Jiang then asked when he should call Kramer back. *Id.* Kramer initially indicated April 29, but then later advised Jiang to call back on May 12. *Id.*

On April 30, Jiang called Kramer again. *Id.* Kramer stated he was still in Europe and would return on May 14, but did not know the time of his flight. *Id.* Jiang asked Kramer if he would accept service upon his return in regards to the League of Women Voters matter. *Id.* Kramer

responded that he did not know and added that he did “not know who those fuckers are.” *Id.* Kramer stated that he had to go and hung up the phone. *Id.*

On May 13, 2024, a process server, John DiCanio, spoke with Kramer over the phone. *See* DiPiero Decl., Exhibit D (DiCanio Affidavit). After DiCanio identified himself as a process server, Kramer referred to a previous conversation with a different server. *Id.* Kramer stated that he or his staff saw a report online after the previous call indicating that Kramer was “supposedly in Europe.” *Id.* Kramer told DiCanio, “[I]f that’s how the server, who is probably a bike messenger, operates then I have no reason to cooperate.” *Id.* DiCanio asked Kramer if he was in New York. *Id.* Kramer confirmed that he was and said, “Come find me.” *Id.*

On May 14, 2024, consistent with Magistrate Judge Saint Marc’s instructions on April 24, 2024, a process server, Timothy Couch, attempted to serve Kramer at the Louisiana Address. *See* DiPiero Decl., Exhibit E (First Couch Affidavit). Although the server reported seeing lights visible through the window near the front door, no one answered the doorbell. *Id.*

On May 16, 2024, a process server, Theresa Barnes, served Kramer’s father and co-resident, Bruce Kramer, at 20 Cloverleaf Drive, New Fairfield, CT 06812 (the “Connecticut Address”). *See* Plaintiffs’ Affidavit of Service of Complaint, ECF No. 57. The process server confirmed with Bruce Kramer that the Connecticut residence was Kramer’s dwelling place and usual place of abode within the state. *Id.* Five days later, on May 21, 2024, counsel for the Plaintiffs, Nathan R. Fennessy, mailed a letter addressed to Kramer to the Connecticut Address. *See* DiPiero Decl., Exhibit F (Fennessy Letter). The letter was successfully delivered to the Connecticut Address with an individual named “Steve” signing for the letter. *Id.*

### **III. Kramer’s Indictment and Arraignment**

On May 22, 2024, Kramer was indicted by the State of New Hampshire on 13 charges of felony voter suppression and 13 charges of misdemeanor impersonation of a candidate. *See*

Amended Complaint, ECF No. 65. On June 5, 2024, Kramer appeared for his arraignment in Belknap County, New Hampshire. *See* DiPiero Decl., Exhibit G (Hearing Transcript). At the arraignment, Assistant Attorney General Brendan O’Donnell argued that Kramer should be ordered to post \$10,000 cash bail, contending the amount was necessary to ensure Kramer returns to court given that he travels frequently and maintains homes in multiple states, including Louisiana and Connecticut. *Id.* at 2-4. O’Donnell also cited the fact that Plaintiffs in the instant matter were having difficulty serving Kramer. *Id.* at 3.

Kramer’s attorney, Tom Reid, contended that Kramer was not a flight risk, arguing that Kramer had “[n]ever not appeared” in a regulatory hearing or civil case. *Id.* at 6. Seemingly referring to the difficulties serving Kramer in the instant litigation, Reid stated, “Getting called up and saying, I’m out of the country, but I’ll be back and I’ll appear as soon as I get back. That’s a good thing.” *Id.* Reid further argued, “[T]his is a man who wants to be heard and wants to have his day in court,” *id.* at 6, later adding, “not only is it his intent to appear whenever required in this Court *or any court in New Hampshire* to address this, what he considers, extremely important issue, he has a track record of always appearing and voluntarily putting himself forth to be involved in this process and every other process he’s involved in,” *id.* at 7 (emphasis added).

During the hearing, Reid confirmed that Kramer has multiple “residences.” *Id.* at 6. Reid identified Louisiana as Kramer’s “primary residence,” but stated that Kramer was “working in New York right now.” *Id.* at 7.

#### **IV. Service of the Amended Complaint on Kramer**

On May 28, 2024, Plaintiffs filed an Amended Complaint in this matter adding a defendant and alleging newly discovered information to support their claims. *See* Amended Complaint, ECF No. 65. On June 5, 2024, the Clerk issued a Summons to Kramer directed to the Connecticut Address where Kramer was previously served. *See* Summons in a Civil Action, ECF No. 68. The

Summons indicated that Kramer had 21 days after service of the Summons to serve an answer to the Amended Complaint or a motion under Rule 12. *Id.* It further stated “[i]f you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint.” *Id.*

On June 7, 2024, two days after Kramer’s attorney represented that he was presently working in New York, a process server, Theresa Barnes, attempted to serve Kramer at the Connecticut Address. *See* DiPiero Decl., Exhibit H (Barnes Affidavit). The server spoke to Bruce Kramer—who previously represented that Kramer lived at that residence. *Id.* Bruce Kramer now stated that Kramer did not live at the residence and moved to Louisiana. *Id.* Bruce Kramer stated that Kramer would not be returning to the address and would not see him. *Id.*

On June 10, 2024, a process server, Timothy Couch, attempted to serve Kramer at the Louisiana Address. *See* DiPiero Decl., Exhibit I (Second Couch Affidavit). The server noted that lights were on throughout the home and someone audibly appeared to be inside the home. *Id.* However, the individual refused to open the door. *Id.* While at the service address, Couch made contact with Kramer over the phone. *Id.* Couch identified himself and indicated he had a delivery of documents for Kramer. *Id.* Kramer began asking Couch a series of questions, including: (1) “Mr. Couch, are you sitting down or standing?”; (2) “Are you parked near by?”; and (3) “Do you have a mirror in your car? If so, look into it and tell yourself to go fuck yourself!” *Id.* Kramer also stated on the call that he was “not going to get served anything.” *Id.* Kramer refused to confirm or deny if he was inside the residence or even in New Orleans. *Id.* The conversation then ended. *Id.* The following day, the process server returned to the Louisiana Address, but no one was home. *Id.*

On June 21, 2024, Plaintiffs sent requests for waivers of service to the Connecticut Address and the Louisiana Address via first class mail. *See* DiPiero Decl., Exhibit J (Waiver Requests). As of this July 30, 2024, Kramer has not responded to the request for waiver of service. *Id.*

On June 27, 2024, a process server, Nicholas Robinson, served a copy of the Summons and Amended Complaint on the New Hampshire Secretary of State in accordance with the procedures set forth in RSA 510:4(II). *See* DiPiero Decl., Exhibit K (Robinson Affidavit). On July 2, 2024, a process server, mailed a Notice of Service, Proof of Service, Summons in a Civil Action, and the Amended Complaint to the Connecticut Address (the “Connecticut Service Package”), and the Louisiana Address (the “Louisiana Service Package”). *See* DiPiero Decl., Exhibit L (Liang Affidavit).

On July 8, 2024, USPS successfully delivered the Connecticut Service Package. *See* DiPiero Decl., Exhibit M (Return Receipt). On July 16, USPS attempted delivery of the Louisiana Service Package and a notice was left because an authorized recipient was not available. *See* DiPiero Decl., Exhibit N (Louisiana USPS Notice).

### **LEGAL STANDARD**

The entry of default judgment in federal court is governed by Federal Rule of Civil Procedure 55. *Hoyos v. Telecorp Commc’ns, Inc.*, 488 F.3d 1, 5 (1st Cir. 2007). Rule 55(a) provides that “[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk *must* enter the party’s default.” *See* Fed. R. Civ. P. 55(a) (emphasis added). Clerks regularly enter default when a party is served and fails to timely answer or otherwise appear. *See Rivera-Aponte v. Gomez Bus Line, Inc.*, 62 F.4th 1, 4 n.1 (1st Cir. 2023) (entering default against a defendant who did not “seasonably answer the complaint”); *Vazquez-Baldonado v. Domenech*, 595 F. App’x 5, 5 (1st Cir. 2015) (the District Court entered a default under Rule 55(a) after the defendants “failed



to plead or otherwise defend”); *United States v. West*, Civil No. 22-cv-232-JL, 2023 WL 7181629, at \*4 (D.N.H. Oct. 11, 2023), *report and recommendation adopted*, 2023 WL 8455024 (D.N.H. Dec. 6, 2023) (default was entered against the defendant after it was served with the complaint and did not appear).

## **ARGUMENT**

### **I. PLAINTIFFS SUCCESSFULLY SERVED DEFENDANT KRAMER**

Federal Rule of Civil Procedure 4 governs service of process. An individual may be served by “leaving a copy [of the complaint and summons] at the individual’s dwelling or usual place of abode with someone of suitable age and discretion who resides there.” Fed. R. Civ. P. 4(e)(2)(B). Additionally, an individual may be served by “following state law for serving a summons in an action brought in courts of general jurisdiction in the state where the district court is located or where service is made.” Fed. R. Civ. P. 4(e)(1). Under this provision, service is proper if it complies with New Hampshire service law, i.e., the state where this court is located. *See Wells Fargo Bank, Nat’l Ass’n for Option One Mortg. Loan Tr. 2007-2, Asset-Backed Certificates, Series 2007-2 v. Moskoff*, No. 17-cv-136-JL, 2017 WL 6276133, at \*1 (D.N.H. Nov. 14, 2017).

New Hampshire law provides that service “may be made by leaving a copy” of service of process “in the hands or office of the secretary of state.” *See* RSA 510:4(II). Such service is “of the same legal force and effect as if served on the defendant at his abode,” provided that “notice thereof and a copy of the process is forthwith sent . . . to the defendant at his last known abode.” *Id.* The “return receipt” and affidavit attesting to compliance with RSA 510:4(II) must be appended to the process and entered with the court. *Id.* “In the event that notice and a copy of the process are not delivered to or accepted by the defendant, the court may order such additional notice, if any as justice may require.” *Id.*

Plaintiffs successfully served Kramer with the Original Complaint. Plaintiffs left a copy of a Summons and the Original Complaint at Kramer's Connecticut Address with Kramer's father, who represented the address was Kramer's dwelling place and usual place of abode within the state. Affidavit of Service, ECF No. 57.

Plaintiffs also successfully served Kramer with a Summons and the First Amended Complaint in compliance with the provisions of RSA 510:4(II). On June 27, 2024, a copy of service of process was left in the hands of the New Hampshire Secretary of State. *See* DiPiero Decl., Exhibit K (Robinson Affidavit). Thereafter, on July 2, Plaintiffs' agents mailed the notice of service on the New Hampshire Secretary of State, as well as a copy of process, to Kramer's Connecticut Address. *See* DiPiero Decl., Exhibits L (Liang Affidavit). A return receipt demonstrating successful delivery of service of process to the Connecticut Address is included as Exhibit K. Plaintiffs have also submitted a declaration affirming compliance with the procedures set forth in RSA 510:4(II). *See* DiPiero Decl. ¶¶ 19-22.

The record reflects that the Connecticut Address is Kramer's "last known abode." On May 13, 2024, Kramer represented to a process server that he was presently in New York. *See* DiPiero Decl., Exhibit D, DiCanio Affidavit. Three days later, on May 13, Kramer's father Bruce Kramer confirmed that Kramer lived at the Connecticut Address. *See* Affidavit of Service, ECF No. 57. Shortly thereafter, an individual named "Steve" signed for a delivery to the Connecticut Address in connection with this litigation. *See* DiPiero Decl., Exhibit F (Fennessy Letter). On June 5, Kramer's attorney represented in the context of a criminal bail proceeding that Kramer was

presently working in New York. *Id.* The record thus evidences that Kramer lives at the Connecticut Address when working in New York.<sup>2</sup>

## II. AN ENTRY OF DEFAULT IS WARRANTED

As explained above, Plaintiffs successfully served Kramer with the Original Complaint on May 16, 2024 and with the Amended Complaint on July 8, 2024. The Summons delivered with the Amended Complaint expressly specified that default would be entered against Kramer if he failed to respond to the Amended Complaint within 21 days of service. *See* ECF No. 68; *see also* Fed. R. Civ. P. 12(a)(1) (explaining that a party must answer within 21 days of service of the summons and complaint). More than 21 days have elapsed and Kramer has failed to respond whatsoever or otherwise appear in the case. Plaintiffs have employed numerous reasonable methods to notify Kramer of the pending lawsuit, Kramer's own statements to process servers and the media demonstrate that he is in fact aware of the lawsuit, and Kramer has had ample opportunity to appear and be heard. Indeed, over 120 days have elapsed since Kramer contacted a witness in this case and accused her of being behind the instant lawsuit. ECF No. 46-2 ¶ 22. Over 90 days have elapsed since Kramer spoke to a news outlet about the merits of the Plaintiffs' lawsuit. DiPiero Decl., Exhibit A. Over 50 days have elapsed since Kramer's attorney represented to a New Hampshire Superior Court that Kramer intended to appear in "any court in New

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<sup>2</sup> Although Plaintiffs pursued simultaneous efforts to serve Kramer at the Louisiana Address, there is no indication that he has lived at that address more recently than the Connecticut Address. As previously described, multiple efforts to locate and serve Kramer at the Louisiana Address have been unsuccessful. Similarly, USPS has failed to deliver multiple packages to the Louisiana Address due to the lack of an authorized recipient in the home. Although Bruce Kramer represented on June 7, 2024 that Kramer had moved to Louisiana and would not be returning to the Connecticut Address, Kramer's own attorney placed Kramer in the adjacent state of New York just two days prior. Kramer's representation to a process server three days later, on June 10, that he was "not going to get served anything" further calls into question the veracity of Bruce Kramer's statement. However, even if the Louisiana Address was Kramer's usual place of abode, the July 16 Louisiana USPS notice followed by Plaintiffs' affidavit of compliance constitutes service because on July 2, 2024, a process server mailed, with prepaid postage, a Notice of Service, Proof of Service, Summons in a Civil Action, and the Amended Complaint to the Louisiana Address. *See* Exhibit L.

Hampshire” in connection with his involvement in the NH Robocalls. DiPiero Decl., Exhibit G at 7. And over 45 days have elapsed since Kramer informed a process server in no uncertain terms that he had no intention of being served (or appearing) in this lawsuit. DiPiero Decl., Exhibit I. As a result, entry of default must be entered by the Clerk of this Court. *See* Fed. R. Civ. P. 55(a); *see also Rivera-Aponte*, 62 F.4th at 4 n.1 (entering default against a defendant who did not “seasonably answer the complaint”); *Vazquez-Baldonado*, 595 F. App’x at 5 (1st Cir. 2015) (same); *West*, 2023 WL 7181629, at \*4 (same).

### **CONCLUSION**

For the reasons stated herein, Plaintiffs respectfully request that the Clerk enter default against Defendant Steve Kramer.

Dated: August 7, 2024

Respectfully submitted,

/s/ Mark R. Herring

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7th day of August, 2024, a true and correct copy of the above and foregoing was mailed by first class mail, postage prepaid to:

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A true and correct copy was also transmitted via electronic mail to Steve Kramer at [gotvcalls@gmail.com](mailto:gotvcalls@gmail.com).

Respectfully submitted,

/s/ Mark R. Herring  
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