

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

**CAROLINE JEFFORDS, and
ROBBIN SOTIR,**

PETITIONERS,

v.

**FULTON COUNTY, FULTON COUNTY
BOARD OF REGISTRATION AND
ELECTIONS, and FULTON COUNTY
CLERK OF SUPERIOR AND
MAGISTRATE COURTS,**

RESPONDENTS.

CIVIL ACTION NO. 2020CV343938

AFFIDAVIT OF SERVICE

Personally, appeared before me, an officer duly qualified to administer oaths, JANINE RAHMING, who after being duly sworn, states the following:

1.

Affiant states that JANINE RAHMING, is over 18 years of age, a Citizen of the United States, and not related to the parties herein. The statements made in the affidavit are true and correct and are based on my personal knowledge.


2.

I personally served MICHAEL MAKEVER ALLIGOOD, by placing a SUBPOENA FOR PRODUCTION OF EVIDENCE AT A VIDEOTAPED DEPOSITION, and WITNESS FEE CHECK into the hands of MICHAEL MAKEVER ALLIGOOD. Personal description is below. I went to Mr. Alligood's place of ABODE at 774 Dill Avenue, SW, Atlanta GA 30310 on June 3, 2021 at approximately 2:04 p.m. Mr. Alligood's wife came to the door. I asked for him, and she said "he's not here....actually he's is." I turned to see Mr. Alligood had just pulled up and parked

across the street. I thanked her and proceeded to meet Mr. Alligood on the sidewalk in front of his home. I held out the envelope to Mr. Alligood, who read the envelope and then accepted it.

This being the 7th day of June 2021.

Sworn to and subscribed to before me
this 7th day of June 2021.



Notary Public





Janine Rahming / Affiant



CIVIL
SUBPOENA FOR DEPOSITION

Caroline Jeffords, et al.

Case Number: 2020CV343938

Versus

Superior Court
Fulton County, Georgia

Fulton County, et al.

To: Name: Michael Makever Alligood

Address: 774 Dill Avenue, SW

Atlanta, GA 30310

GREETINGS:

You are hereby commanded, that you attend and give testimony at the following date and time: The 18th day of June, 2021 at 9:00 a.m./~~p.m.~~

At the following address and place:

**Fulton County Attorney's Office at Government Center 141 Pryor Street,
Suite 4038, Atlanta GA 30303**

Then and there to be examined on deposition for the purpose of discovery and for the preservation of testimony by the Petitioners in the above entitled case, and to bring with you to said deposition the following books, papers, documents and tangible things:

This deposition shall be recorded by the following means:

Stenographic means; Sound; Sound and Visual means.

HEREIN FAIL NOT, UNDER PENALTY OF LAW

This the 3rd day of June, 2021

Signed: 

Print Name: Robert D. Cheeley

Address: 2500 Old Milton Pkwy, Ste 200
Alpharetta, GA 30009

Phone: (770) 804 - 7001

Attorney for: Petitioners

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**FULTON COUNTY, FULTON COUNTY
BOARD OF REGISTRATION AND
ELECTIONS, and FULTON COUNTY
CLERK OF SUPERIOR AND
MAGISTRATE COURTS,**

RESPONDENTS.

SUBPOENA FOR PRODUCTION OF EVIDENCE AT A VIDEOTAPED DEPOSITION

To: Michael Makever Alligood
774 Dill Avenue, SW
Atlanta, GA 30310

YOU ARE COMMANDED to be present, pursuant to O.C.G.A. §§ 9-11-30 and 24-13-20, *et seq.*, to be sworn as a witness in the above action by the Petitioners' undersigned counsel.

The videotaped deposition will be taken upon oral examination on **Friday, June 18, 2021, beginning at 9:00 a.m., at Fulton County Attorney's Office at Government Center 141 Pryor Street, Suite 4038, Atlanta GA 30303**, in the presence of an officer duly authorized to administer oaths. Said deposition will be taken by stenographic and videographic means. The witness will be examined on deposition for purposes of discovery, and immediately thereafter will be deposed for preservation of testimony for use at trial and for all other purposes allowed under the Georgia Civil Practice Act. The deposition will continue from day to day until said examination is completed. All parties and counsel are invited to attend and examine the witness.

At the time of said deposition, Michael Makever Alligood is to have in his possession the following:

1. Please produce any and all emails, text messages or any other electronic means of communication between you and anyone at the Georgia Secretary of State's office, or any other organizations, such as CEIR, ERIC, NASS, NASED, campaigns, nonpartisan organizations and government officials connected with absentee ballots in Georgia for the November 3, 2020 election. This shall encompass the period from January 1, 2020, through December 31, 2020.
2. A thumb drive containing separately an electronic bit by bit image of all communications for the time period of January 1, 2020, through December 31, 2020 made and received by Michael Makever Alligood relating to the November 3, 2020 general election contained on Michael Makever Alligood cellphones, emails, tablets, desktop computer or drive, laptops, computers, TMSnapchat account, TMWhatsApp account, TMFacebook account, TMInstagram account, TMYouTube postings or account, and other social media communications and any and all other electronic devices and electronic accounts under the custody and control of Michael Makever Alligood at any time.
3. Bring all electronic devices (including but not limited to cell phones, tablets, thumb drives, laptop computers, desktop computers, in any and all other electronic drives containing electronic stored information) under the custody and control of Michael Makever Alligood which were utilized during your activities from approximately January 1, 2020, through December 31, 2020, at the Georgia Secretary of States' office.
4. Please verify by providing pay stubs and W-2s and any written agreements with the Georgia Secretary of State outlining what your scope of service was, or any other

documents reflecting your source of income from approximately January 1, 2020, through December 31, 2020, at the Georgia Secretary of States' office.

Submitted this 3rd day of June, 2021.



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*Attorney for Petitioners,
Caroline Jeffords and Robbin Sotir*