

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**THE HONORABLE RICK PERRY,**

**Plaintiff,**

**THE HONORABLE NEWT GINGRICH, THE  
HONORABLE JON HUNTSMAN, JR., AND  
THE HONORABLE RICK SANTORUM,**

**Intervenor-Plaintiffs,**

v.

**Civil No. 3:11-cv-856**

**CHARLES JUDD, KIMBERLY BOWERS, and  
DON PALMER, members of the Virginia State  
Board of Elections, in their official capacities, and  
PAT MULLINS, in his official capacity as  
Chairman of the Republican Party of Virginia,**

**Defendants.**

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**NOTICE OF INTERVENOR-PLAINTIFFS NEWT GINGRICH, JON HUNTSMAN, JR.,  
AND RICK SANTORUM TO COURT REGARDING LIVE WITNESSES FOR  
PENDING HEARING ON THE PRELIMINARY INJUNCTION**

In accordance with the Court's Order of December 29, 2011, Intervening Plaintiffs Newt Gingrich, Jon Huntsman, Jr., and Rick Santorum hereby provide notice of the live witnesses they intend to call at the pending hearing on the preliminary injunction scheduled for Friday, January 13, 2012. As requested by the Court, the expected testimony of each live witness is briefly summarized below.

**Intended or Available Live Witnesses of Intervening Plaintiff Newt Gingrich**

1. **Ms. Rachel P. Robinson** – Ms. Rachel Robinson is the Ballot Access Coordinator for Newt 2012, Inc., the principal campaign committee of Intervening Plaintiff Gingrich. During all relevant time periods in November and December of 2011, Ms. Robinson

assumed primary responsibility on behalf of Speaker Gingrich's campaign to ensure that he collected the requisite signatures statewide and in each Congressional District and otherwise met the statutory requirements for inclusion on the Virginia Republican Party primary ballot for President of the United States. In undertaking those responsibilities, she coordinated the efforts of volunteer residents from the Commonwealth of Virginia as well as the services of paid circulators and signature gatherers. She also ensured that Speaker Gingrich submitted to the Virginia State Board of Elections (the "Board") 11,050 petition signatures of purportedly eligible Virginia voters. In light of these facts, we intend to have Ms. Robinson available to testify as to the aforementioned subjects and other aspects of Speaker Gingrich's ballot access efforts at the January 13, 2011 hearing on the preliminary injunction.

**2. Mr. Michael Whatley** – Mr. Michael Whatley is a consultant for Newt 2012, Inc., the principal campaign committee of Intervening Plaintiff Gingrich. During November and December of 2011, Mr. Whatley assisted Speaker Gingrich's campaign in its efforts to collect the requisite signatures statewide and in each Congressional District and otherwise meet the statutory requirements for inclusion on the Virginia Republican Party primary ballot for President of the United States. In undertaking those responsibilities, he assisted the campaign with coordinating the efforts of volunteer residents from the Commonwealth of Virginia as well as the services of paid circulators and signature gatherers. Mr. Whatley also assisted the campaign in submitting to the Board 11,050 petition signatures of purportedly eligible Virginia voters. In addition, Mr. Whatley was a designated campaign observer during the Republican Party of Virginia's signature verification process, which took place on December 23 and December 24, 2011. In light of these facts, we intend to have Mr. Whatley available to testify as to the aforementioned subjects and other aspects of Speaker Gingrich's ballot access efforts at

the January 13, 2011 hearing on the preliminary injunction.

**3. Ms. Karla Bruno** – Ms. Karla Bruno is a Virginia-based volunteer for Newt 2012, Inc., the principal campaign committee of Intervening Plaintiff Gingrich. During November and December of 2011, Ms. Bruno assisted Speaker Gingrich’s campaign in its efforts to collect the requisite signatures statewide and in each Congressional District and otherwise meet the statutory requirements for inclusion on the Virginia Republican Party primary ballot for President of the United States. In undertaking those responsibilities, she assisted the campaign in coordinating the efforts of volunteer residents from the Commonwealth of Virginia. Ms. Bruno also assisted the campaign in submitting to the Board 11,050 petition signatures of purportedly eligible Virginia voters. In addition, Ms. Bruno was a designated campaign observer during the Republican Party of Virginia’s signature verification process, which took place on December 23 and December 24, 2011. In light of these facts, we intend to have Ms. Bruno available to testify as to the aforementioned subjects and other aspects of Speaker Gingrich’s ballot access efforts at the January 13, 2011 hearing on the preliminary injunction.

**Intended or Available Live Witnesses of Intervening Plaintiff Jon Huntsman, Jr.**

**1. Mr. Blake Harris** – Mr. Blake Harris is the Ballot Access Coordinator for Huntsman for President, the principal campaign committee of Intervening Plaintiff Huntsman. Prior to December 2011, Mr. Harris assumed primary responsibility on behalf of Governor Huntsman’s campaign to determine if he could collect the requisite signatures statewide and in each Congressional District to otherwise meet the statutory requirements for inclusion on the Virginia Republican Party primary ballot for President of the United States. Intervening Plaintiff Huntsman intends to have Mr. Harris available to testify as to these subjects and other aspects of Governor Huntsman’s ballot access efforts at the January 13, 2011 hearing on the preliminary

injunction.

**Intended or Available Live Witnesses of Intervening Plaintiff Rick Santorum**

1. **Mr. Mark Tate**— Mr. Mark Tate is the Ballot Access Coordinator for Rick Santorum for President, the principal campaign committee of Intervening Plaintiff Rick Santorum. Prior to December 2011, Mr. Tate assumed primary responsibility on behalf of Senator Santorum's campaign to determine if he could collect the requisite signatures statewide and in each Congressional District to otherwise meet the statutory requirements for inclusion on the Virginia Republican Party primary ballot for President of the United States. Intervening Plaintiff Santorum intends to have Mr. Tate available to testify as to these subjects and other aspects of the challenges Senator Santorum confronted with respect to his ballot access efforts at the January 13, 2011 hearing on the preliminary injunction.

Respectfully submitted this 6<sup>th</sup> day of January, 2012.

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 6, 2012, I will electronically file the foregoing document with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to all counsel of record:

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