

**STATE OF MICHIGAN**  
**IN THE CIRCUIT COURT FOR THE COUNTY OF ANTRIM**

WILLIAM BAILEY

Plaintiff

Case No. 20-9238-CZ

v.

ANTRIM COUNTY

HON. KEVIN A. ELSENHEIMER

Defendant,

SECRETARY OF STATE JOCELYN  
BENSON

Intervenor-Defendant,

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Matthew S. DePerno (P52622)  
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**PLAINTIFF'S EXPERT WITNESS LIST**

Plaintiff WILLIAM BAILEY, by and through his attorney, DePERNO LAW OFFICE, PLLC, submit for his Expert Witness List the following:

1. Russel Ramsland; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Ramsland is expected to testify as to election integrity, systems, process, generally accepted practices, standards of care, and election voting systems, including the Dominion Voting Systems. He is expected to testify regarding adjudication logs, systems files, applications security issues, and the review and preparation of the Antrim Michigan

Forensics Report, Revised Preliminary Summary, v2, dated December 13, 2020 ("ASOG Report"). He is expected to testify regarding cyber/computer network operations, data analysis, and operations integration in computer and voting systems. He is expected to testify on how the Dominion Voting Systems affects elections. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available through course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

2. Col. James P. (Phil) Wadron; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Col. Waldron is expected to testify as to election integrity, systems, process, generally accepted practices, standards of care, and election voting systems, including the Dominion Voting Systems. He is expected to testify regarding adjudication logs, systems files, applications security issues, and the review and preparation of the Antrim Michigan Forensics Report, Revised Preliminary Summary, v2, dated December 13, 2020 ("ASOG Report"). He is expected to testify regarding cyber/computer network operations, data analysis, and operations integration in computer and voting systems. He is expected to testify on how the Dominion Voting Systems affects elections. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available through course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

3. Doug Logan; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Logan is expected to testify as to application security, systems, process, generally accepted programming practices, standards of care, as it relates to application development of sensitive systems. He is expected to testify regarding best practices for access control, exception handling, error handling, auditing, and logging. He is expected to testify on the adjudication process, and the lack of adjudication logs found on the forensic image. He is expected to base his testimony on his review of the forensics images obtained from the Antrim County computer system, a review of Dominion Voting Systems publicly available documentation and resources, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available throughout the course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

4. Greg Freemyer; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Freemyer is expected to testify regarding the identification and forensic imaging and preservation of the Antrim County election management server, thumb drives, and compact flash cards performed in this case. He is expected to base his testimony on his knowledge and review of the forensic imaging process obtained from the Antrim County

computer system, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available through course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

5. Paul Maggio; **EXPERT WITNESS**; c/o DePerno Law Office, PLLC

Mr. Maggio is expected to testify regarding the identification and forensic imaging and preservation of the Antrim County election management server, thumb drives, and compact flash cards performed in this case. He is expected to base his testimony on his knowledge and review of the forensic imaging process obtained from the Antrim County computer system, deposition testimony that will be generated in this matter, documentation regarding the forensic images, the ASOG Report, Plaintiff's claims, Defendants' defenses, and any other information that becomes available through course of discovery with respect to this case. Plaintiff reserves the right to supplement this disclosure.

6. Any rebuttal or impeachment witness necessary to rebut any evidence or testimony presented by any other party to this lawsuit.
7. Any expert witness required to rebut evidence presented by Defendants
8. Plaintiff reserve all rights to identify further witnesses as they become known.

Respectfully submitted

DePERNO LAW OFFICE, PLLC

Dated: December 23, 2020

/s/ Matthew S. DePerno

Matthew S. DePerno (P52622)  
Attorney for Plaintiff