

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

THE STATE OF GEORGIA,	)	
	)	CIVIL ACTION NO.
	)	1:23-CV-03792-SCJ
	)	
v.	)	
	)	RE: NOTICE OF REMOVAL
	)	OF FULTON COUNTY
	)	SUPERIOR COURT
SHAWN MICAH TRESHER STILL,	)	INDICTMENT NO.
	)	23SC188947
Defendant.	)	

**STATE OF GEORGIA’S RESPONSE TO DEFENDANT’S TENDER OF  
EXHIBITS 4 AND 5 AT SEPTEMBER 20, 2023 HEARING**

Defendant Still tendered Defendants’ Exhibit 4 (purporting to be an excerpt from a 1961 Congressional Record volume) and Exhibit 5 (documents purporting to be certified records of the 1960 disputed Hawaii election contest) at the evidentiary hearing held September 20, 2023. As those exhibits had not been provided to the State prior to the hearing, the Court permitted the State time to review the exhibits to determine its position on the admission of both exhibits.

Based on the post-hearing representation by opposing counsel as to the source of the excerpt represented in **Exhibit 4** (Congressional Record), the State has no objection to its admission. The State, however, does object to the admission of the **Exhibit 5** insofar as the documents have handwritten notes and

comments in the margin. The State has no objection to the portions of Exhibit 5 that contain no handwritten notes, nor does the State have an objection to Defendant Still being provided an opportunity to redact the comments or provide a certified copy of the court file directly from the Circuit Court of the First Judicial Circuit of Hawaii (as opposed to the tendered copy that came from the John. F. Kennedy Presidential Library, per the representation of opposing counsel).

Respectfully submitted, this 21st day of September 2023.

**FANI T. WILLIS  
DISTRICT ATTORNEY  
ATLANTA JUDICIAL CIRCUIT**

*/s/ Anna Green Cross*  
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**CERTIFICATE OF COMPLIANCE**

The undersigned counsel hereby certifies that this pleading complies with the Local Rules of this Court, including Local Rules 5.1.C and 7.1.D (N.D. Ga.) in that it is double-spaced and composed in 14-point Times New Roman font.

This 21st day of September 2023.

/s/ Anna Green Cross  
Anna Green Cross  
Special Prosecutor  
Atlanta Judicial Circuit  
Georgia Bar No. 306674