

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

STATE OF GEORGIA

v.

DAVID JAMES SHAFER *et al.*

Defendants.

Case No. 23SC188947

**DEFENDANT DAVID J. SHAFER'S MOTION TO ADOPT MOTIONS,  
DEMURRERS, PLEAS AND BRIEFS BY CO-DEFENDANTS ROBERT  
CHEELEY, JOHN EASTMAN, HARRISON FLOYD, MICHAEL ROMAN,  
SHAWN STILL AND DONALD TRUMP**

Defendant David J. Shafer files this Motion to Adopt Motions, Demurrers, Pleas and Briefs by Co-Defendants Robert Cheeley, John Eastman, Harrison Floyd, Michael Roman, Shawn Still and Donald Trump and hereby moves to adopt the following motions, demurrers, pleas and briefs by co-defendants in this action:

1. Defendant Robert Cheeley's Post-Hearing Brief in Support of Defendant Robert David Cheely's Joint General and Special Demurrer, Plea in Bar and Motion to Quash, filed December 18, 2023;
2. Defendant John Eastman's Special Demurrer on Count 1 (RICO), filed January 8, 2024;
3. Defendant Harrison Floyd's General Demurrer to Count 1 (Issue: Pattern of Racketeering Activity), filed January 8, 2024;
4. Defendant Shawn Still's Plea in Bar and Motion to Quash the Indictment, filed January 8, 2024;
5. Defendant Shawn Still's General Demurrer Regarding Counts 8, 10, 12, 14 and 16, filed January 8, 2024;

6. Defendant Shawn Still's General Demurrer Regarding Count One, filed January 8, 2024;
7. Defendant Shawn Still's Special Demurrer, filed January 8, 2024;
8. Defendant Donald Trump's Motion to Dismiss on Due Process Grounds and Memorandum in Support, filed January 8, 2024;
9. Defendant Michael Roman's Motion to Dismiss Grand Jury Indictment as Fatally Defective and Motion to Disqualify The District Attorney, Her Office and The Special Prosecutor From Further Prosecuting This Matter, filed January 8, 2024;
10. Defendant Robert Cheeley's Motion to Dismiss the Grand Jury Indictment and Disqualify the Dismiss The Grand Jury Indictment and Disqualify the District Attorney, Her Office, and the Special Prosecutors, filed January 26, 2024; and
11. Defendant Michael Roman's Initial Reply to The State's Response to Mr. Roman's Motion to Dismiss and Disqualify the District Attorney, filed February 2, 2024.

Respectfully submitted, this 5th day of February, 2024.

/s/ Craig A. Gillen  
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Counsel for David J. Shafer

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 5th day of February, 2024, filed the foregoing filing with the Court using the Court's Odyssey eFileGa system, serving copies of the filing on all counsel of record in this action, and furthermore have sent a copy of the filing to the parties and the Court.

/s/ Craig A. Gillen  
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