

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

IN RE GEORGIA SENATE BILL 202

Master Case No.
1:21-MI-55555-JPB

UNITED STATES OF AMERICA,

Plaintiff

v.

Civil Action No.
1:21-CV-2575-JPB

THE STATE OF GEORGIA, *et al.*,

Defendants

SIXTH DISTRICT OF THE AFRICAN

BRAD RAFFENSPERGER, *et al.*,

Defendants

GEORGIA STATE CONFERENCE OF
THE NAACP, *et al.*,

Plaintiffs

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants

Civil Action No.
1:21-CV-01259-JPB

THE CONCERNED BLACK CLERGY OF
METROPOLITAN ATLANTA, INC., *et al.*,

Plaintiffs

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants

Civil Action No.
1:21-CV-01728-JPB

PLAINTIFFS' JOINT MOTION FOR PRELIMINARY INJUNCTION

Pursuant to 52 U.S.C. § 10308 and Federal Rule of Civil Procedure 65, Plaintiff United States of America (“United States”) and Private Plaintiffs from four cases,¹ move for entry of a preliminary injunction enjoining the State of Georgia, the Georgia State Election Board, and the Georgia Secretary of State (“Defendants”), from enforcing certain provisions of Georgia Senate Bill 202 (2021). These provisions include (1) the dramatic reduction innc mbdrop5.3 (o)TJ-0.001 Tc 0.0

than the last four digits of their Social Security number to confirm their identity on their absentee ballot application (Section 25).

To ensure more than enough time to implement the relief sought before the 2024 federal election cycle, and mindful of this Court's prior order addressing the *Purcell* doctrine, *see* ECF 241 at 63 (citing *Purcell v. Gonzalez*

public interest. *See McDonald's Corp. v. Robertson*, 147 F.3d 1301, 1306 (11th Cir. 1998).

Plaintiffs file an accompanying Memorandum of Law in Support of their Motion for a Preliminary Injunction, relevant exhibits containing evidentiary materials, and a proposed order granting the motion.

Date: May 30, 2023

RYAN K. BUCHANAN
United States Attorney
Northern District of Georgia

/s/ Aileen Bell Hughes
AILEEN BELL HUGHES
Georgia Bar No. 375505
Assistant U.S. Attorney
Office of the United States Attorney
600 U.S. Courthouse
75 Ted Turner Drive, SW
Atlanta, GA 30303
Phone: (404) 581-6000
Fax: (404) 581-6181

Respectfully submitted,

KRISTEN CLARKE
Assistant Attorney General

ELISE BODDIE
Principal Deputy Assistant
Attorney General
Civil Rights Division

/s/ Jasmyn G. Richardson
T. CHRISTIAN HERREN, JR.
JOHN A. RUSS IV
JASMYN G. RICHARDSON
RACHEL R. EVANS
ERNEST A. MCFARLAND
MAURA EILEEN O'CONNOR
ELIZABETH M. RYAN
SEJAL JHAVERI
J. ERIC RICH
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice

Brittini A. Hamilton*
brittnihamilton@dwt.com
DAVIS WRIGHT TREMAINE LLP
865 South Figueroa Street, 24th Floor
Los Angeles, California 90017-2566
Telephone: (213) 633-6800
Facsimile: (213) 633-6899

250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888

George P. Varghese*
george.varghese@wilmerhale.com
Stephanie Lin*

Matthew R. Jedreski*
mjedreski@dwt.com
Grace Thompson*
gracethompson@dwt.com
Danielle E. Kim*
daniellekim@dwt.com
Kate Kennedy*
katekennedy@dwt.com
Shontee Pant*
ShonteePant@dwt.com
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, Washington 98104-1610
Telephone: (206) 622-3150
Facsimile: (206) 757-7700

David M. Gossett*
davidgossett@dwt.com
Courtney DeThomas*
courtneydethomas@dwt.com
DAVIS WRIGHT TREMAINE LLP
1301 K Street NW, Suite 500
Washington, D.C. 20005-7048
Telephone: (202) 973-4288
Facsimile: (202) 973-4499

Facsimile: (213) 443-5400

Attorneys for Plaintiffs Georgia Muslim Voter Project, Women Watch Afrika, Latino Community Fund Georgia, and The Arc of the United States

**Admitted pro hac vice*

***Application to be admitted pro hac vice forthcoming*

/s/ Sophia Lin Lakin

Sophia Lin Lakin*

slakin@aclu.org

Davin M. Rosborough*

drosborough@aclu.org

Jonathan Topaz*

jtopaz@aclu.org

Dayton Campbell-Harris*

dcampbell-harris@aclu.org

ACLU FOUNDATION

125 Broad Street, 18th Floor

New York, New York 10004

Telephone: (212) 519-7836

Facsimile: (212) 549-2539

/s/ Rahul Garabadu

Rahul Garabadu (Bar 553777)

rgarabadu@acluga.org

Caitlin May (Bar 602081)

cmay@acluga.org

Cory Isaacson (Bar 983797)

cisaacson@acluga.org

ACLU FOUNDATION OF GEORGIA, INC.

P.O. Box 570738

Atlanta, Georgia 30357

Telephone: (678) 981-5295

Facsimile: (770) 303-0060

Susan P. Mizner*

smizner@aclu.org

ACLU FOUNDATION, INC.

39 Drumm Street

San Francisco, CA 94111

Telephone: (415) 343-0781

Brian Dimmick*

bdimmick@aclu.org

ACLU FOUNDATION, INC.

915 15th Street NW

Washington, D.C. 20005

Telephone: (202) 731-2395

Attorneys for Plaintiffs

Sixth District of the African Methodist Episcopal Church, Delta Sigma Theta Sorority, Georgia ADAPT, Georgia Advocacy Office, and Southern Christian Leadership Conference

/s/ Bryan L. Sells

Bryan L. Sells
Georgia Bar No. 635562
The Law Office of Bryan Sells, LLC
PO Box 5493
Atlanta, Georgia 31107
Tel: (404) 480-4212
Email: bryan@bryansellslaw.com

Jon Greenbaum (pro hac vice)
jgreenbaum@lawyerscommittee.org
Ezra D. Rosenberg (pro hac vice)
erosenberg@lawyerscommittee.org
Julie M. Houk (pro hac vice)
jhouk@lawyerscommittee.org
Jennifer Nwachukwu (pro hac vice)
jnwachukwu@lawyerscommittee.org
Heather Szilagyi (pro hac vice)
hszilagyi@lawyerscommittee.org
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1500 K Street NW, Suite 900
Washington, D.C. 20005
Telephone: (202) 662-8600
Facsimile: (202) 783-0857

Vilia Hayes (pro hac vice)
Neil Oxford (pro hac vice)
Gregory Farrell (pro hac vice)

Tina Meng Morrison*
Marcos Mocine-McQueen*
Samuel T. Ward-Packard*
ELIAS LAW GROUP LLP
250 Massachusetts Ave NW
Suite 400
Washington, D.C. 20001
Telephone: (202) 968-4490

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(D)

Pursuant to Local Rule 7.1(D), I certify that the foregoing document was prepared in Times New Roman 14-point font in compliance with Local Rule 5.1(C).

/s/ Jasmyn G. Richardson
JASMYN G. RICHARDSON
Attorney, Voting Section
Civil Rights Division
U.S. Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2023, I electronically filed the foregoing with the clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Jasmyn G. Richardson
JASMYN G. RICHARDSON
Attorney, Voting Section
Civil Rights Division
U.S. Department of Justice