

DEC 16, 2020 08:36 AM


Carolyn V. Sullivan, Clerk of Superior Court
Houston County, Georgia

IN THE SUPERIOR COURT OF HOUSTON COUNTY
STATE OF GEORGIA

THE NEW GEORGIA PROJECT,

Plaintiff,

v.

KATHERINE SHELTON, in her official capacity
as Chair of the Houston County Board of Elections;
BARBARA WADDLE, in her official capacity as
Vice Chair of the Houston County Board of
Elections; JOHN APPLGATE, in his official
capacity as a Member of the Houston County Board
of Elections; HENRY CHILDS, in his official
capacity as a Member of the Houston County Board
of Elections; SHERMAN FALANA, in his official
capacity as a Member of the Houston County Board
of Elections,

Defendants.

Civil Action No.

EMERGENCY RELIEF REQUESTED

PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER

Pursuant to O.C.G.A. § 9-11-65, O.C.G.A. § 9-6-20, and O.C.G.A. § 21-2-385, Plaintiff
The New Georgia Project ("NGP") hereby moves this Court for an emergency temporary
restraining order and writ of mandamus, with an accompanying memorandum of points and
authorities filed contemporaneously and a proposed order granting the relief requested herein.
Plaintiff requests that the Court consider this Emergency Motion on an expedited basis. This
Emergency Motion asks the Court to order Defendants to make certain additional dates available
for advance voting as required by Georgia law. The dates in question are quickly approaching.
Providing full statutorily-defined advance voting access is crucial to NGP's mission and will
ensure that more Georgia voters are enfranchised.

Defendants' failure to comply with the Georgia Election Code limits the ability of Plaintiff's members to cast their vote in the runoff election. If Plaintiff's request is not approved before December 19, 2020—and, indeed, as soon as possible so that the availability of advance voting on that date can be adequately publicized—many voters, including Plaintiff's members and constituents, will be disenfranchised.

WHEREFORE, Plaintiff requests that this Court issue an order requiring Defendants to allow advance voting access on (a) Saturday, December 19, 2020 from 9:00 a.m. to 4:00 p.m.; and (b) during regular business hours on January 4, 2021; and permit any voters seeking to cast their ballots on those dates to vote in compliance with O.C.G.A. § 21-2-385.

Respectfully submitted on this 15th day of December 2020.

KREVOLIN & HORST, LLC

/s/ Adam M. Sparks

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**Pro hac vice admission pending*

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