

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

GEORGIA STATE CONFERENCE OF THE)
NAACP, as an organization; et al.,)

Plaintiffs,)

v.)

BRAD RAFFENSPERGER, in his official)
capacity of the Secretary of State for the State)
of Georgia, et al.,)

Defendants,)

REPUBLICAN NATIONAL COMMITTEE,)
INC., et al.,)

Intervenor-Defendants.)
)
)
)
)

Civil Action

Case No. 1:21-cv-1259-JPB

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Pursuant to the Court's Order on December 9, 2021, Plaintiffs Georgia State Conference Of The NAACP; Georgia Coalition For The People's Agenda, Inc.; League Of Women Voters Of Georgia, Inc.; Galeo Latino Community Development Fund, Inc.; Common Cause; Lower Muskogee Creek Tribe; and The Urban League Of Greater Atlanta, Inc., submit the following comment regarding the consolidation of the following cases: 1:21-cv-01229; 1:21-cv-01259; 1:21-cv-

01284; 1:21-cv-01333; 1:21-cv-01390; 1:21-cv-01728; 1:21-cv-02070; and 1:21-cv-02575.

Plaintiffs do not object to the consolidation of the above-captioned case for discovery purposes with those listed in the Court's December 9, 2021 Order.

Plaintiffs agree with the Court that the aforementioned cases involve overlapping facts, legal issues, and defendants, and that consolidation will promote judicial economy and efficiency, and conserve the time and resources of both the parties and the Court.

To that end and given the Court's order denying Defendants' motions to dismiss and forthcoming 2022 elections, Plaintiffs request that the Court lift the stay of discovery and related deadlines imposed in its June 14, 2021 order. If discovery is consolidated, Plaintiffs will meet and confer with Defendants regarding appropriate limitations given the number of Plaintiffs, Defendants, and claims.

Dated: December 14, 2021

/s/ Bryan L. Sells

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LOCAL RULE 7.1(D) CERTIFICATION OF COMPLIANCE

I hereby certify that the foregoing pleading has been prepared with Times New Roman font, 14 point, one of the font and point selections approved by the Court in L.R. 5.1C, N.D. Ga.

/s/ Bryan L. Sells

Bryan L. Sells

Attorney for Plaintiffs

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