

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

SIXTH DISTRICT OF THE
AFRICAN METHODIST
EPISCOPAL CHURCH, *et al.*,

CIVIL ACTION NO. 1:21-CV-01284-JPB

Plaintiffs,

v.

BRIAN KEMP, Governor of the State
of Georgia, in his official capacity, *et
al.*,

Defendants.

PLAINTIFFS' STATEMENT REGARDING CONSOLIDATION

Plaintiffs Sixth District of the African Methodist Episcopal Church, Delta Sigma Theta Sorority, Georgia ADAPT, Georgia Advocacy Office, Southern Christian Leadership Conference, Georgia Muslim Voter Project, Women Watch Afrika, Latino Community Fund Georgia, and The Arc of the United States (“Plaintiffs”) respectfully submit this statement in response to the Court’s Order of December 9, 2021, regarding consolidation of this case with the following cases: *The New Georgia Project v. Raffensperger*, No. 1:21-cv-1229 (N.D. Ga.); *Georgia State Conference of the NAACP v. Raffensperger*, No. 1:21-cv-1259 (N.D. Ga.); *Asian Americans Advancing Justice-Atlanta v. Raffensperger*, No. 1:21-cv-1333

(N.D. Ga.); *Vote America v. Raffensperger*, No. 1:21-cv-1390 (N.D. Ga.); *Concerned Black Clergy of Metropolitan Atlanta, Inc. v. Raffensperger*, No. 1:21-cv-1728 (N.D. Ga.); *Coalition for Good Governance v. Raffensperger*, No. 1:21-cv-2070 (N.D. Ga.); and *United States of America v. State of Georgia*, No. 1:21-cv-2575 (N.D. Ga.).

Plaintiffs support the Court's consolidating the listed cases for discovery purposes and agree with and incorporate by reference the comment filed by Plaintiffs Asian Americans Advancing Justice—Atlanta, Steven Paik, Deepum Patel, Nora Aquino, Thuy Hang Tran, Thao Tran, and Anjali Enjeti-Sydow in case 1:21-cv-01333, Dkt. 72, as well as the statement filed by the United States Department of Justice in case 1:21-cv-02575, Dkt. 70.¹

Plaintiffs respectfully request that the Court lift the stay of discovery imposed in its June 14, 2021 order, and set a schedule that permits this Court to determine Plaintiffs' entitlement to relief, either in the form of a preliminary or permanent injunction, in advance of fall 2022 elections. Plaintiffs will endeavor to coordinate

¹ Consistent with the Department of Justice's statement, Plaintiffs would potentially support consolidation for trial, depending on the litigation schedule adopted by the Court.

with counsel for the plaintiffs and defendants in each of the listed cases in order to expedite the proceedings and conserve resources.²

Respectfully submitted this 14th day of December, 2021.

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² Although Plaintiffs originally proposed a six-month period for discovery in their disclosures made pursuant to Federal Rule of Civil Procedure 26(f), *see* Dkt. 88 p.19 (filed June 9, 2021), Plaintiffs may seek a more accelerated schedule in light of the time that expired during the stay of discovery for briefing on the dispositive motions and the need for relief in time for fall 2022 elections.

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of L.R. 5.1, using font type of Times New Roman and a point size of 14.

Dated: December 14, 2021

/s/ Rahul Garabadu

Rahul Garabadu

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CERTIFICATE OF SERVICE

I hereby certify that on December 14, 2021, I electronically filed this document with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the attorneys of record.

Dated: December 14, 2021

/s/ Rahul Garabadu

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