

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

VOTEAMERICA; et al.,

*Plaintiffs,*

v.

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

*Defendants,*

REPUBLICAN NATIONAL COMMITTEE; et al.,

*Intervenor-Defendants.*

No. 1:21-cv-1390-JPB

**INTERVENOR-DEFENDANTS' MOTION TO  
DISMISS & BRIEF IN SUPPORT**

Intervenors move to dismiss Plaintiffs' complaint in its entirety for failure to state a claim, Fed. R. Civ. P. 12(b)(6). As explained in the State's motion, the challenged provisions do not regulate protected speech or association at all; even if they did, heightened scrutiny does not apply; and under any level of scrutiny, the challenged provisions are adequately tailored to the State's interests and are neither overbroad nor vague. *See* State MTD Br. (Doc. 40-1) 7-25; State MTD Reply (Doc. 51) 4-15. Consistent with their pledge to "work to prevent duplicative briefing," Mot. to Interv. (Doc. 25-1) 5, Intervenors join the State's briefs on these points.

Respectfully submitted,

Dated: June 21, 2021

/s/ Cameron T. Norris

John E. Hall, Jr.  
Georgia Bar No. 319090  
William Bradley Carver, Sr.  
Georgia Bar No. 115529  
W. Dowdy White  
Georgia Bar No. 320879  
HALL BOOTH SMITH, P.C.  
191 Peachtree St. NE, Ste. 2900  
Atlanta, GA 30303  
(404) 954-6967

Tyler R. Green (*pro hac vice*)  
Cameron T. Norris (*pro hac vice*)  
Steven Begakis (*pro hac vice*)  
CONSOVOY MCCARTHY PLLC  
1600 Wilson Blvd., Ste. 700  
Arlington, VA 22209  
(703) 243-9423  
tyler@consovoymccarthy.com  
cam@consovoymccarthy.com  
steven@consovoymccarthy.com

*Counsel for Intervenor-Defendants*

**CERTIFICATE OF COMPLIANCE**

I certify that this document complies with Local Rule 5.1(B) because it uses 13-point Century Schoolbook.

/s/ Cameron T. Norris

**CERTIFICATE OF SERVICE**

On June 21, 2021, I e-filed this document on ECF, which will serve everyone requiring service.

/s/ Cameron T. Norris