

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

ASIAN AMERICANS ADVANCING
JUSTICE-ATLANTA, et al.,

Plaintiffs,

v.

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

Defendants.

Civil Case No. 1:21-cv-01333-JPB

PLAINTIFFS' COMMENT REGARDING CONSOLIDATION

RETRIEVED FROM DEMOCRACYDOCKET.COM

Pursuant to the Court's Order on December 9, 2021, Plaintiffs Asian Americans Advancing Justice—Atlanta, Steven Paik, Deepum Patel, Nora Aquino, Thuy Hang Tran, Thao Tran, and Anjali Enjeti-Sydow 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 Court's consolidating for discovery purposes the instant case 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; consolidation will promote judicial economy and efficiency, as well as 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.

Respectfully submitted this 14th day of December, 2021.

/s/ Phi Nguyen

PHI NGUYEN (Georgia Bar No.
578019)
**ASIAN AMERICANS
ADVANCING JUSTICE-ATLANTA**
5680 Oakbrook Parkway, Suite 148
Norcross, Georgia 30093
404 585 8446 (Telephone)
404 890 5690 (Facsimile)
pnguyen@advancingjustice-atlanta.org

/s/ Niyati Shah

NIYATI SHAH*
TERRY AO MINNIS*^o
**ASIAN AMERICANS
ADVANCING JUSTICE-AAJC**
1620 L Street, NW, Suite 1050
Washington, DC 20036
202 815 1098 (Telephone)
202 296 2318 (Facsimile)
nshah@advancingjustice-ajc.org
tminnis@advancingjustice-ajc.org

/s/ Eileen Ma

EILEEN MA*
**ASIAN AMERICANS
ADVANCING JUSTICE-ASIAN
LAW CAUCUS**
55 Columbus Avenue
San Francisco, CA 94111
415 896 1701 (Telephone)
415 896 1702 (Facsimile)
eileenm@advancingjustice-alc.org

/s/ R. Adam Lauridsen

LEO L. LAM*
R. ADAM LAURIDSEN*
CONNIE P. SUNG*
CANDICE MAI KHANH NGUYEN*
LUIS G. HOYOS*
RYLEE KERCHER OLM*
**KEKER, VAN NEST AND PETERS
LLP**
633 Battery Street
San Francisco, CA 94111-1809
415 391 5400 (Telephone)
415 397 7188 (Facsimile)
llam@keker.com
alauridsen@keker.com
csung@keker.com
cnguyen@keker.com
lhoyos@keker.com
rolm@keker.com

Attorneys for Plaintiffs
**Admitted pro hac vice*
^oNot admitted in D.C.

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/ R. Adam Lauridsen

R. ADAM LAURIDSEN

Attorney for Plaintiffs

RETRIEVED FROM DEMOCRACYDOCKET.COM

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on December 14, 2021, a true and correct copy of the foregoing Plaintiffs' Statement re Consolidation was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send notification of such filing to all attorneys of record.

/s/ R. Adam Lauridsen

R. ADAM LAURIDSEN

Attorney for Plaintiffs

RETRIEVED FROM DEMOCRACYDOCKET.COM