

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

IN RE GEORGIA SENATE BILL 202	Master Case No. 1:21-MI-55555-JPB
<p>THE NEW GEORGIA PROJECT, <i>et al.</i>,</p> <p style="text-align:center"><i>Plaintiffs,</i></p> <p style="text-align:center">v.</p> <p>BRAD RAFFENSPERGER, in his official capacity as the Secretary of State for the State of Georgia, <i>et al.</i>,</p> <p style="text-align:center"><i>Defendants,</i></p> <p>REPUBLICAN NATIONAL COMMITTEE, <i>et al.</i>,</p> <p style="text-align:center"><i>Intervenor-Defendants.</i></p>	<p>Civil Action No.:</p> <p>1:21-CV-01229-JPB</p>

**THE SPALDING COUNTY AND BROOKS COUNTY DEFENDANTS’
BRIEF IN RESPONSE TO THE NEW GEORGIA PROJECT PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

The Spalding County and Brooks County Defendants request that Plaintiffs’ Motion for Preliminary Injunction [Dkt. No. 185] be denied. The NGP Plaintiffs’ Motion for Preliminary Injunction (the “Motion”) challenges O.C.G.A. § 21-2-414(a). Section 414(a) restricts so-called “line relief” activities. The Motion seeks the same relief as that sought by the AME & Georgia NAACP Plaintiffs in an earlier-filed Motion for Preliminary Injunction [Dkt. No. 171].

The Spalding County and Brooks County Defendants have joined in a Consolidated Brief in Response to the AME and Georgia NAACP Plaintiffs' Motion for Preliminary Injunction [Dkt. No. 195]. In this brief, the County Defendants argued that Plaintiffs are not entitled to the preliminary injunction they seek because they cannot show a substantial likelihood of success on the merits of their claims, irreparable harm in the absence of injunctive relief, a balancing of equities in their favor, or that injunctive relief against County Defendants is in the public interest. The Spalding County and Brooks County Defendants expressly incorporate that brief and its arguments in its response to the present Motion.

Respectfully submitted this 24th day of June, 2022.

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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 the font type of Times New Roman and a point size of 14.

Dated: June 24, 2022

/s/ Karl P. Broder

Attorney for Spalding County Defendants

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CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2022, I electronically filed the foregoing
BROOKS COUNTY AND SPALDING COUNTY DEFENDANTS' RESPONSE
TO THE NGP PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION with
the Clerk of Court using the CM/ECF system which will automatically send email
notification of such filing to the attorneys of record.

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