

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

SIXTH DISTRICT OF THE  
AFRICAN METHODIST  
EPISCOPAL CHURCH, *a Georgia  
nonprofit organization, et al.,*

*Plaintiffs,*

Case No. 1:21-cv-01284

UNITED STATES OF AMERICA,  
*Plaintiff-Intervenor,*

v.

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

*Defendants,*

REPUBLICAN NATIONAL  
COMMITTEE, *et al.,*  
*Intervenor-Defendants.*

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IN RE GEORGIA SENATE BILL 202

Master Case No. 1:21-mi-55555

**INTERVENOR-DEFENDANTS' ANSWER  
TO UNITED STATES' COMPLAINT**

Intervenors—the Republican National Committee, National Republican Senatorial Committee, National Republican Congressional Committee, and Georgia Republican Party, Inc.—answer the Complaint in Intervention of the United States (Doc. 873). Unless expressly admitted below, every allegation in the complaint is denied. Accordingly, Intervenors state:

1. SB 202 speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

2. SB 202 speaks for itself. Intervenors otherwise deny this allegation.

3. Intervenors deny that Defendants are violating the law. They otherwise lack sufficient information to admit or deny this allegation.

4. The Complaint and SB 202 speak for themselves.

5. Deny.

### **JURISDICTION AND VENUE**

6. These legal arguments require no response.

7. These legal arguments require no response.

8. These legal arguments require no response.

### **PARTIES**

9. Admit.

10. Admit.

11. These legal arguments require no response.

12. Intervenors admit that Brad Raffensperger is Secretary of State of the State of Georgia. This paragraph otherwise contains legal arguments requiring no response.

**ALLEGATIONS**

13. Intervenors lack sufficient information to admit or deny this allegation.

14. Intervenors lack sufficient information to admit or deny this allegation.

15. Intervenors lack sufficient information to admit or deny this allegation.

16. Intervenors lack sufficient information to admit or deny this allegation.

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29. Intervenors lack sufficient information to admit or deny this allegation.

30. Intervenors lack sufficient information to admit or deny this allegation.

31. Intervenors lack sufficient information to admit or deny this allegation.

32. Intervenors lack sufficient information to admit or deny this allegation.

33. The cited cases speak for themselves.

34. The cited legal authorities speak for themselves.

35. The cited statute speaks for itself.

36. Intervenors lack sufficient information to admit or deny this allegation.

37. Intervenors lack sufficient information to admit or deny this allegation.

38. SB 202 speaks for itself.

39. Intervenors lack sufficient information to admit or deny this allegation.

40. Intervenors lack sufficient information to admit or deny this allegation.

41. Intervenors lack sufficient information to admit or deny this allegation.

42. Intervenors lack sufficient information to admit or deny this allegation.

43. SB 202 speaks for itself.

44. SB 202 speaks for itself.

45. The cited statute speaks for itself.

46. The cited statutes speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

47. Intervenors lack sufficient information to admit or deny this allegation.

48. SB 202 speaks for itself.

49. SB 202 speaks for itself.

50. SB 202 speaks for itself.

51. SB 202 speaks for itself.

52. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

53. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

54. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

55. Intervenors lack sufficient information to admit or deny this allegation.

56. Intervenors lack sufficient information to admit or deny this allegation.

57. Intervenors lack sufficient information to admit or deny this allegation.

58. Intervenors lack sufficient information to admit or deny this allegation.

59. Intervenors lack sufficient information to admit or deny this allegation.

60. SB 202 and the Secretary's announcement speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

61. SB 202 speaks for itself.

62. SB 202 speaks for itself, but they deny the characterization that the law "results in a particularly short time period for requesting absentee ballots for runoff elections."

63. Intervenors lack sufficient information to admit or deny this allegation.

64. Intervenors lack sufficient information to admit or deny this allegation.

65. Intervenors lack sufficient information to admit or deny this allegation.

66. The State Election Board Rule speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

67. The State Election Board Rule speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

68. The State Election Board Rule speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

69. Intervenors lack sufficient information to admit or deny this allegation.

70. The cited news article speaks for itself. Intervenors lack sufficient information to admit or deny this allegation.

71. Intervenors lack sufficient information to admit or deny this allegation.

72. Intervenors lack sufficient information to admit or deny this allegation.

73. SB 202 speaks for itself.

74. SB 202 speaks for itself.

75. SB 202 speaks for itself.

76. SB 202 and the cited case speak for themselves. Intervenors otherwise deny this allegation.

77. Intervenors lack sufficient information to admit or deny this allegation.

78. Intervenors lack sufficient information to admit or deny this allegation.

79. Intervenors lack sufficient information to admit or deny this allegation.

80. Intervenors lack sufficient information to admit or deny this allegation.



81. Intervenors lack sufficient information to admit or deny this allegation.

82. SB 202 speaks for itself.

83. Deny.

84. SB 202 and the cited statute speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

85. SB 202 speaks for itself.

86. SB 202 speaks for itself.

87. Intervenors lack sufficient information to admit or deny this allegation.

88. Intervenors lack sufficient information to admit or deny this allegation.

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104. Intervenors lack sufficient information to admit or deny this allegation.

105. Intervenors lack sufficient information to admit or deny this allegation.

106. Intervenors lack sufficient information to admit or deny this allegation.

107. Intervenors lack sufficient information to admit or deny this allegation.

108. Intervenors lack sufficient information to admit or deny this allegation.

109. The cited statutes speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

110. Intervenors lack sufficient information to admit or deny this allegation.

111. Intervenors lack sufficient information to admit or deny this allegation.

112. Intervenors lack sufficient information to admit or deny this allegation.

113. Intervenors lack sufficient information to admit or deny this allegation.

114. Intervenors lack sufficient information to admit or deny this allegation.

115. Intervenors lack sufficient information to admit or deny this allegation.

116. The Secretary's statement speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

117. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

118. Intervenors lack sufficient information to admit or deny this allegation.

119. Intervenors lack sufficient information to admit or deny this allegation.

120. The legislative record speaks for itself.

121. The legislative record speaks for itself.

122. The cited article speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

123. The legislative record speaks for itself.

124. The legislative record speaks for itself.

125. The legislative record speaks for itself.

126. The legislative record speaks for itself.

127. Intervenors lack sufficient information to admit or deny this allegation.

128. The legislative record speaks for itself, but Intervenors deny the characterization that “[w]itnesses had minimal time to read and comment” on the bill.

129. The legislative record speaks for itself.

130. The legislative record speaks for itself.

131. The legislative record speaks for itself.

132. The legislative record speaks for itself.

133. The legislative record speaks for itself.

134. The legislative record speaks for itself.

135. The legislative record speaks for itself.

136. The legislative record speaks for itself.

137. The legislative record speaks for itself.

138. The legislative record speaks for itself.

139. The legislative record speaks for itself.

140. The legislative record speaks for itself.

141. The legislative record speaks for itself.

142. Deny.

143. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

144. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

145. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

146. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

147. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

148. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

149. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

150. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

151. Intervenors lack sufficient information to admit or deny this allegation.

152. Intervenors lack sufficient information to admit or deny this allegation.

153. Intervenors lack sufficient information to admit or deny this allegation.

154. Intervenors lack sufficient information to admit or deny this allegation.

155. Intervenors lack sufficient information to admit or deny this allegation.

156. Intervenors lack sufficient information to admit or deny this allegation.

157. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

158. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

159. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

160. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

161. Intervenors lack sufficient information to admit or deny this allegation.

162. Intervenors lack sufficient information to admit or deny this allegation.

163. Intervenors lack sufficient information to admit or deny this allegation.

164. The legislative record speaks for itself.

165. Deny.

166. Intervenors deny that “the Georgia General Assembly departed from its normal procedural practice in passing the bill.” The legislative record otherwise speaks for itself.

167. This legal argument requires no response.

### **CAUSE OF ACTION**

#### **Violation of Equal Protection**

#### **U.S. Constitution, Amendment XIV (Intentional Race Discrimination)**

168. Intervenors incorporate their responses in the preceding paragraphs.

169. The Constitution speaks for itself.

170. SB 202 speaks for itself. The remaining allegations are legal arguments that require no response.

171. This legal argument requires no response.

172. This legal argument requires no response.

173. This legal argument requires no response.

174. This legal argument requires no response.



## RESPONSE TO PRAYER FOR RELIEF

Intervenors deny that the United States is entitled to its requested relief.

### AFFIRMATIVE DEFENSES

1. The allegations in the complaint fail to state a claim.
2. Plaintiffs' requested relief is barred by the *Purcell* principle.

Dated: August 1, 2024

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Respectfully submitted,

/s/ Gilbert C. Dickey

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### **CERTIFICATE OF COMPLIANCE**

This document complies with Local Rule 5.1(B) because it uses 13-point Century Schoolbook.

*/s/ Gilbert C. Dickey*

### **CERTIFICATE OF SERVICE**

On August 1, 2024, I e-filed this document on ECF, which will email everyone requiring service.

*/s/ Gilbert C. Dickey*

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