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

PRIVATE PLAINTIFFS' RESPONSE TO STATE DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY

On July 18, 2024, State Defendants filed a notice of supplemental authority concerning two recent U.S. Supreme Court decisions, along with extensive, inappropriate argument, asserting that each case confirms that summary judgment should be entered in their favor because Private Plaintiffs[1] lack standing. ECF No. 876 at 1. The State Defendants' unilateral filing of additional summary judgment argument, without leave of Court, is procedurally improper and should be disregarded.[2] But should the Court choose to consider State Defendants'

[1] Private Plaintiffs for the purposes of this Response include the named private plaintiffs in the following cases: *Ga. State Conf. of the NAACP v. Raffensperger*, 1:21-CV-1259; *Sixth Dist. of the Afr. Methodist Episcopal Church v. Kemp*, 1:21-CV-1284; *Asian Americans Advancing Justice-Atlanta v. Raffensperger*, 1:21-CV-1333; and *The Concerned Black Clergy of Metro. Atlanta Inc. v. Raffensperger*, 1:21-CV-1728.

[2] It is well established that "notices of supplemental authority should not make legal argument." *Minus v. Miami-Dade Cnty.*, No. 19-cv-25113-BLOOM/Louis, 2021 WL 1185683, at *1 (S.D. Fla. Mar. 26, 2021). "[S]upplemental filings should do

supplemental brief, Private Plaintiffs respond briefly here to provide the Court with appropriate context as it considers the fully-briefed summary judgment papers.[3] Importantly, neither recent Supreme Court case calls for any departure from existing standing jurisprudence nor contradicts, undermines, or narrows the well-accepted case law which, as detailed in Plaintiffs' Opposition (*see* ECF No. 826), supports rejection in its entirety of State Defendants' Motion for Summary Judgment on Jurisdiction.

---

nothing more" than "direct the Court's attention to legal authority or evidence that was not available" when the party initially filed its brief and "note the argument to which the legal authorities or evidence relate." *Girard v. Aztec RV Resort, Inc.*, No. 10-62298-CIV, 2011 WL 4345443, at *2 (S.D. Fla. Sept. 16, 2011). Here, it is plain that State Defendants' "Notice of Supplemental Authority does not merely *identify* a relevant case but rather *comments* on that case," and as such "the filing impermissibly adds pages to [their] Motion for Summary Judgment." *Wall v. Centers for Disease Control & Prevention*, No. 6:21-CV-975-PGB-DCI, 2021 WL 4948143, at *2 (M.D. Fla. Oct. 19, 2021); *see also* L.R. 56.1 (parties shall not be permitted to file supplemental summary judgment briefs or materials without an order of court). State Defendants submitted a nine-page filing that is largely pure legal argument, which includes an entire section of legal argument titled "Impact of Supreme Court Decisions on Existing Precedent" citing *only* cases decided long before State Defendants submitted their reply briefs in support of their motions for summary judgment. *See* ECF No. Doc. 876 at 8-9. As such, State Defendants' Notice of Supplemental Authority is procedurally improper and should be disregarded.

[3] State Defendants' general arguments did not indicate which complaints or parties it believes are affected by the recent Supreme Court decisions. To the extent this Court seeks more detailed briefing about how, if at all, these decisions specifically affect certain complaints and/or claims in any of the pending cases, Private Plaintiffs request the opportunity for more fulsome briefing.

I. *FDA v. Alliance for Hippocratic Medicine*

In *FDA v. Alliance for Hippocratic Medicine*, the plaintiff associations and individual doctors sued the Food and Drug Administration ("FDA") to rescind the drug mifepristone's approval and modifications to its conditions of use. *FDA v. All. for Hippocratic Med.*, 602 U.S. 367, 376-377 (2024). The plaintiffs had never prescribed nor used mifepristone, nor confronted any complications from its use; they were unregulated parties who had ideological objections to mifepristone and sought to challenge FDA's regulation of it. *Id.* at 372. Ultimately, the Court rejected all of the plaintiffs' theories of standing as unsupported and too speculative. As the Court stated, "citizens and doctors do not have standing to sue simply because *others* are allowed to engage in certain activities." *Id.* at 392-393. Had it accepted the standing theories, the Court reasoned that, eventually, "virtually every citizen [would have] standing to challenge virtually every government action that they do not like." *Id.*

Specifically, the plaintiffs argued that FDA's regulation of mifepristone might cause conscience injuries to the individual doctors and the specified members of the medical associations because they might be forced, against their consciences, to render emergency treatment to someone suffering complications from mifepristone. *Id.* at 386-388. But the Court found that existing federal law fully protects doctors from being required to treat patients in any way that would violate their consciences.

Id. at 386-387. Moreover, the plaintiffs failed to show that doctors could be forced to participate in any treatment over their conscience objections and could not identify any circumstance in which their conscience protections had actually been unavailable. *Id.* at 388-389.

The plaintiffs also contended that FDA's relaxed regulation of mifepristone may cause downstream economic injuries to the doctors. *Id.* at 390-393. The plaintiff doctors cited theoretical monetary and related injuries that they *might* suffer as a result of FDA's actions, including diverting resources and time from other patients to treat patients with mifepristone complications, increasing risk of liability suits from treating those patients, and potentially increasing insurance costs. *Id.* The Supreme Court likewise rejected these allegations as no evidence supported the likelihood of any one of the links in the chain of events occurring.

Finally, the plaintiffs asserted organizational standing based on theories that FDA's relaxed regulation of mifepristone causes injuries to medical associations themselves, but the Supreme Court also found these theories unavailing. *Id.* at 393-396 (citing *Havens Realty Corp. v. Coleman*, 455 U.S. 363 (1982)). The plaintiffs argued that organizational standing exists whenever an organization spends its resources in response to a defendant's actions. *All. for Hippocratic Med.*, 602 U.S. at 393-396. But the Court explained that *Havens* does not provide that "all the organizations in America . . . have standing to challenge almost every federal policy

that they dislike, provided they spend a single dollar opposing those policies." *Id.* at 395. The Supreme Court noted that the plaintiff organization in *Havens* diverted resources in response to actions that "directly affected and interfered with [the plaintiff's] core business activities." *Id.* (explaining that the plaintiff "not only was an issue-advocacy organization, but also operated a housing counseling service" that was "perceptibly impaired" by illegal racial steering). The *Alliance for Hippocratic Medicine* plaintiffs did not allege a similar type of injury, and no evidence suggested that FDA's actions concerning mifepristone "imposed any similar impediment to the medical associations' advocacy businesses." *Id.*[4] Those plaintiffs simply disagreed with the FDA's decisions as "concerned bystanders" without a concrete stake in the dispute. *Id*. at 382. In other words, the *Alliance for Hippocratic Medicine* plaintiffs had an almost uniquely weak case for establishing organizational standing under *Havens*.

The opposite is true for Private Plaintiffs here, who include individuals directly regulated by the challenged provisions of S.B. 202 and direct service providers, not merely ideological opponents. The individual plaintiffs in these consolidated cases assert direct – not downstream – injuries. *See* ECF No. 826 at

[4]And while the medical associations claimed that the FDA's failure to collect and disseminate information about mifepristone made their function of informing the public more difficult, their lawsuit did not assert informational injury, but rather sought to invalidate the drug's approval. *Id.* at 395-396.

68-74. Meanwhile, the organizational plaintiffs' missions include the protection of voting rights and advocating for and educating citizens about public policy issues and the voting process. *See id.* at 14-68. Consistent with their missions, the organizational plaintiffs have diverted their finite resources to counteract the unconstitutional and wrongful acts of Defendants, including to educate members and their communities about the challenged provisions of S.B. 202 so that these regulated voters – to whom the new restrictions apply and who have already been impacted by them – could exercise their right to vote. *See id*. The organizational plaintiffs' core missions were directly affected and interfered with by S.B. 202's restrictions on voters, evidence that was missing in *Alliance for Hippocratic Medicine*. *Id.* Moreover, the organizational plaintiffs predate S.B. 202, have provided services to Georgia voters both prior and subsequent to S.B. 202's passage, and were not formed merely to oppose the statute. In no respect are they "spending their way" into standing. ECF No. 875 at 4-5.

State Defendants assert that "organizational standing cannot exist in every instance where an organization spends funds pursuing education or advocacy." ECF No. 876 at 2. This argument obfuscates the point. Organizational standing exists where, as here, Defendants' illegal acts impair the organizational plaintiffs' ability to engage in their programs by forcing them to divert resources to counteract those illegal acts. *See, e.g.,* ECF No. 826 at 11-14. And *Alliance for Hippocratic*

Medicine did not disturb *Havens*' holding that organizational standing exists where a defendant's "actions directly affected and interfered with [a plaintiff-organization's] core business activities." *All. for Hippocratic Med.*, 602 U.S. at 395.

Contrary to State Defendants' assertions, nothing is speculative about the harms that have occurred and will continue to occur from S.B. 202 here. Voters have already had to navigate the voting restrictions; these restrictions have already led to instances of voting difficulties and even disenfranchisement; and the organizational plaintiffs have already had to divert resources to respond. ECF No. 826 at 19-74 (explaining and substantiating injuries Plaintiff-by-Plaintiff). State Defendants' new submission nowhere attempts to apply *Alliance for Hippocratic Medicine* to these facts of record. And, of course, Private Plaintiffs need show standing only as to one Private Plaintiff in order to support each claim, as they have plainly done here. *See id.* at 11. In other words, Private Plaintiffs have "show[n] a predictable chain of events leading from the government action to the asserted injury." *All. for Hippocratic Med.*, 602 U.S. at 385. As the Supreme Court explained in *Alliance for Hippocratic Medicine*, "in 'many cases the standing question can be answered chiefly by comparing the allegations of the particular complaint to those made in prior standing cases.'" *Id.* at 384 (internal citations omitted). As extensive case law illustrates, where the government limits the ways in which citizens can cast a vote, that new limit may cause harm to individual voters and the organizations dedicated

to educating and helping voters access the franchise, thus substantiating standing for those organizations. *See, e.g., Fla. State Conf. of NAACP v. Browning*, 522 F.3d 1153, 1165 (11th Cir. 2008); *Common Cause/Georgia v. Billups*, 554 F.3d 1340, 1350 (11th Cir. 2009).

At bottom, the Supreme Court's comments about organizational standing in *Alliance for Hippocratic Medicine* have no bearing on this case. Principally, they reaffirmed that *Havens*, and the organizational standing set out therein, remains good law.

II. *Murthy v. Missouri*

Consistent with most traceability and redressability-heavy analyses, *Murthy v. Missouri*, is a fact-intensive ruling. There, the individual and state plaintiffs sued various Executive Branch officials and agencies, alleging that they pressured social media platforms to censor their speech in violation of the First Amendment and moved to enjoin the defendants from pressuring platforms to censor future speech. *Murthy v. Missouri*, 144 S. Ct. 1972, 1981 (2024). Notably, the plaintiffs did not sue the social media platforms who restricted their content, only the officials and agencies allegedly "behind it." *Id.* at 1984.

While the lower courts determined that the defendant officials likely "coerced" or "significantly encouraged" the social media platforms "to such extent that their content-moderation decisions should be deemed to be the decisions of the

Government," (*id*. (internal punctuation omitted)), the Supreme Court overturned this conclusion. *First*, the plaintiffs' claims largely lacked evidence suggesting—let alone proving—that any social medical platforms had ever removed content in response to government pressure in the past. *Id.* at 1987. The platforms were already engaged in content moderation before any discussions with the government officials and agencies and had independent motives for removing content. *Id.* In some instances, the platforms had moderated the content and restricted the accounts of the plaintiffs before the government had communicated with them. *Id.* at 1992. In other words, "there was no likelihood of any future injury based on past conduct" (ECF No. 876 at 5-6) because the evidence that the government's past conduct had ever caused injury was *de minimis* and weak. "If a plaintiff demonstrates that a particular Government defendant was behind her past social-media restriction, it will be easier for her to prove that she faces a continued risk of future restriction that is likely to be traceable to that same defendant." *Murthy*, 144 S. Ct. at 1987. *Second*, the plaintiffs did not present evidence of an ongoing pressure campaign by the defendants that would suggest a risk of future content suppression—there was no evidence of relevant government communications with the social media platforms. *Id.* at 1993. Therefore, "it [was] entirely speculative that the platforms' future moderation decisions [would] be attributable, even in part, to the defendants." *Id*.

Not only was there no causal link based on the facts in that case between the

plaintiffs' alleged injuries and the defendants' actions, but the plaintiffs also failed to show their injuries were redressable by the defendants. *Id.* at 1995. The plaintiffs requested judicial relief in the form of an injunction stopping the defendant agencies and officials from pressuring the platforms to suppress speech. *Id.* Even if the Court had enjoined the defendants from interfering with the platforms' application of their own policies, the platforms would have remained free to enforce, or not to enforce, their policies and would not have been obligated to follow any legal determination the suit produced. *Id.* Enjoining the defendants would not likely affect the non-party platforms' content moderation decisions. *Id.* at 1995-1996.

Unlike in *Murthy*, the instant case does not "require guesswork as to how independent [non-party] decisionmakers will exercise their judgment." *Id.* at 1986. The county elections officials—whom State Defendants claim are the ones making some of the decisions as to implementing the elections laws at issue—are not only parties to the action, but also are under the direction and control of State Defendants who are possessed with the oversight of and authority over the voting process in Georgia. *See* ECF No. 826 at 80-96. All the injuries Private Plaintiffs here allege from the various challenged provisions are real, nonspeculative, and traceable to State Defendants. *Id.* Moreover, as carefully detailed in Private Plaintiffs' prior briefs, enjoining State Defendants as to any one of S.B. 202's challenged provisions is likely to result in Plaintiffs obtaining the relief—discontinuation of the application

of unconstitutional laws—requested. *Id.* Unlike in *Murthy*, where the companies had their own policies and enforced them regardless of the governmental defendants' communications, there is no evidence that the counties here operate independent policies impervious to the State's direction. Just the opposite: the counties have been largely bystanders in this litigation and have not even moved for summary judgment or appealed the Court's injunction against them, relying instead, entirely on the State's interpretations. In short, the Court's highly fact-intensive analysis in *Murthy* is irrelevant to the completely different facts presented by this case, breaks no new ground, and should not affect this Court's standing analysis.

In summary, neither of these Supreme Court decisions supports entering summary judgment on jurisdiction for State Defendants as each are distinguishable from the facts in the instant case. Both *Alliance for Hippocratic Medicine* and *Murthy* are consistent with the precedent already presented to this Court in summary judgment briefing and State Defendants' Motion should be denied.

Dated: August 2, 2024 By: */s/ Laurence F. Pulgram*

/s/ Bryan L. Sells
Bryan L. Sells
Email: bryan@bryansellslaw.com
Georgia Bar No. 635562
THE LAW OFFICE OF BRYAN SELLS, LLC
PO Box 5493
Atlanta, Georgia 31107
Tel: (404) 480-4212

Ezra D. Rosenberg (pro hac vice)
erosenberg@lawyerscommittee.org
Julie M. Houk (pro hac vice)
jhouk@lawyerscommittee.org
Jennifer Nwachukwu (pro hac vice)
jnwachukwu@lawyerscommittee.org
Heather Szilagyi (pro hac vice)
hszilagyi@lawyerscommittee.org
LAWYERS' COMMITTEE FOR CIVIL RIGHTS UNDER LAW
1500 K Street NW, Suite 900
Washington, D.C. 20005
Telephone: (202) 662-8600
Facsimile: (202) 783-0857

Vilia Hayes (pro hac vice)
vilia.hayes@hugheshubbard.com
Neil Oxford (pro hac vice)
neil.oxford@hugheshubbard.com
Gregory Farrell (pro hac vice)
gregory.farrell@hugheshubbard.com
Mana Ameri
mana.ameri@hugheshubbard.com
William Beausoleil
william.beausoleil@hugheshubbard.com

James Henseler (pro hac vice)
james.henseler@hugheshubbard.com
HUGHES HUBBARD & REED LLP
One Battery Park Plaza
New York, New York 10004-1482
Telephone: (212) 837-6000
Facsimile: (212) 422-4726

Gerald Weber
Email: wgerryweber@gmail.com
Georgia Bar No. 744878
Law Offices of Gerry Weber, LLC
Post Office Box 5391
Atlanta, Georgia 31107
Telephone: 404.522.0507

Laurence F. Pulgram (pro hac vice)
lpulgram@fenwick.com
Molly Melcher (pro hac vice)
mmelcher@fenwick.com
Armen Nercessian (pro hac vice)
Anercessian@fenwick.com
Ethan Thomas (pro hac vice)
EThomas@fenwick.com
FENWICK & WEST LLP
555 California Street
San Francisco, CA 94104
Telephone: (415) 875-2300

Joseph S. Belichick (pro hac vice)
jbelichick@fenwick.com
FENWICK & WEST LLP
Silicon Valley Center
801 California Street
Mountain View, CA 94041-2008
Telephone: (650) 988-8500

Catherine McCord (pro hac vice)
cmccord@fenwick.com
FENWICK & WEST LLP
902 Broadway, Suite 14
New York, NY 10010
Telephone: (212) 430-2690

Attorneys for Plaintiffs Georgia State Conference of the NAACP, Georgia Coalition for the People's Agenda, Inc., League of Women Voters of Georgia, Inc., GALEO Latino Community Development Fund, Inc., Common Cause, and the Lower Muskogee Creek

/s/ Kurt Kastorf
Kurt Kastorf (GA Bar No. 315315)
KASTORF LAW, LLC
1387 Iverson Street, N.E., Suite 100
Atlanta, GA 30307
Telephone: 404-900-0330
kurt@kastorflaw.com

Judith Browne Dianis*
Matthew A. Fogelson*
ADVANCEMENT PROJECT
1220 L Street, N.W., Suite 850
Washington, DC 20005
Telephone: (202) 728-9557
JBrowne@advancementproject.org
MFogelson@advancementproject.org

Clifford J. Zatz*
Justin D. Kingsolver*
William Tucker*
CROWELL & MORING LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: (202) 624-2500
CZatz@crowell.com
JKingsolver@crowell.com
WTucker@crowell.com

Jordan Ludwig*
CROWELL & MORING LLP
515 South Flower Street, 40th Floor
Los Angeles, CA 90071
Telephone: (213) 443-5524
JLudwig@crowell.com

*Admitted *pro hac vice*

Attorneys for Plaintiffs The Concerned Black Clergy of Metropolitan Atlanta, Inc., The Justice Initiative, Inc., Metropolitan Atlanta Baptist Ministers Union, Inc., First Congregational Church, United Church of Christ Incorporated, Georgia Latino Alliance for Human Rights, Inc.

s/ Leah C. Aden
Leah C. Aden (pro hac vice)
laden@naacpldf.org
Alaizah Koorji (pro hac vice)
akoorji@naacpldf.org
John S. Cusick (pro hac vice)
jcusick@naacpldf.org
NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, New York 10006
Telephone: (212) 965-2200
Facsimile: (212) 226-7592

Anuja Thatte (pro hac vice)
athatte@naacpldf.org
NAACP LEGAL DEFENSE AND EDUCATION FUND, INC. 700 14th Street, NW Washington, DC 20005
Telephone: (202) 682-1300

Caitlin May (Ga. Bar No. 602081)
cmay@acluga.org
Cory Isaacson (Ga. Bar No. 983797)
cisaacson@acluga.org
ACLU FOUNDATION OF GEORGIA, INC.
P.O. Box 77208
Atlanta, Georgia 30357
Telephone: (678) 981-5295
Facsimile: (770) 303-0060

Sophia Lin Lakin (pro hac vice)
slakin@aclu.org
Davin M. Rosborough (pro hac vice)
drosborough@aclu.org
Jonathan Topaz (pro hac vice)
jtopaz@aclu.org
Dayton Campbell-Harris (pro hac vice)
dcampbell-harris@aclu.org
ACLU FOUNDATION
125 Broad Street, 18th Floor
New York, New York 10004
Telephone: (212) 519-7836
Facsimile: (212) 549-2539

Susan P. Mizner (pro hac vice)
smizner@aclu.org
ACLU FOUNDATION, INC.
39 Drumm Street
San Francisco, CA 94111
Telephone: (415) 343-0781

Brian Dimmick (pro hac vice)
bdimmick@aclu.org
ACLU FOUNDATION, INC.
915 15th Street NW
Washington, D.C. 20005
Telephone: (202) 731-2395

Debo P. Adegbile (pro hac vice)
debo.adegbile@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888

George P. Varghese (pro hac vice)
george.varghese@wilmerhale.com
Stephanie Lin (pro hac vice)
stephanie.lin@wilmerhale.com
Mikayla Foster (pro hac vice)
mikayla.foster@wilmerhale.com
Sofie C. Brooks (pro hac vice)
sofie.brooks@wilmerhale.com
WILMER CUTLER PICKERING

HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

Tania Faransso (pro hac vice)
tania.faransso@wilmerhale.com
Laura E. Powell (Ga. Bar. No. 970318)
laura.powell@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2100 Pennsylvania Ave. NW
Washington, D.C. 20037
Telephone: (202) 663-6000
Facsimile: (202) 663-6363

Nana Wilberforce (pro hac vice)
nana.wilberforce@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
350 South Grand Avenue, Suite 2400
Los Angeles, California 90071
Telephone: (213) 443-5300
Facsimile: (213) 443-5400

Attorneys for Plaintiffs Sixth District of the African Methodist Episcopal Church, Delta Sigma Theta Sorority, Georgia ADAPT, Georgia Advocacy Office

/s/ Pichaya Poy Winichakul
Pichaya Poy Winichakul (Bar 246858)
poy.winichakul@splcenter.org
Bradley E. Heard (Bar 342209)
bradley.heard@splcenter.org
Matletha N. Bennette (pro hac vice)
matletha.bennette@splcenter.org
SOUTHERN POVERTY LAW CENTER
150 E. Ponce de Leon Ave., Suite 340
Decatur, Georgia 30031-1287
Telephone: (404) 521-6700
Facsimile: (404) 221-5857

Jess Unger (pro hac vice)
jess.unger@splcenter.org
Sabrina S. Khan (pro hac vice)
sabrina.khan@splcenter.org
SOUTHERN POVERTY LAW CENTER
1101 17th Street NW, Suite 705
Washington, DC 20036
Telephone: (202) 728-9557

/s/ Adam Sieff
Adam S. Sieff (pro hac vice)
adamsieff@dwt.com
Brittni Hamilton (pro hac vice)
brittnihamilton@dwt.com
DAVIS WRIGHT TREMAINE LLP
865 South Figueroa Street, 24th Floor
Los Angeles, California 90017-2566
Telephone: (213) 633-6800
Facsimile: (213) 633-6899

Matthew Jedreski (pro hac vice)
mjedreski@dwt.com
Grace Thompson (pro hac vice)
gracethompson@dwt.com
Danielle Eun Kim (pro hac vice)
daniellekim@dwt.com
Kate Kennedy
katekennedy@dwt.com
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, Washington 98104-1610
Telephone: (206) 622-3150
Facsimile: (206) 757-7700

David M. Gossett (pro hac vice)
davidgossett@dwt.com
DAVIS WRIGHT TREMAINE LLP
1301 K Street NW, Suite 500
Washington, D.C. 20005-7048
Telephone: (202) 973-4288
Facsimile: (202) 973-4499

Attorneys for Plaintiffs Georgia Muslim Voter Project, Women Watch Afrika, Latino Community Fund Georgia, and The Arc of the United States

/s/Meredyth L. Yoon
MEREDYTH L. YOON
(Georgia Bar No. 204566)
ASIAN AMERICANS ADVANCING JUSTICE-ATLANTA
5680 Oakbrook Parkway, Suite 148
Norcross, Georgia 30093
404 585 8446 (Telephone)
404 890 5690 (Facsimile)
myoon@advancingjustice-atlanta.org

/s/Niyati Shah
NIYATI SHAH*
NOAH BARON*
ASIAN AMERICANS ADVANCING JUSTICE-AAJC
1620 L Street, NW, Suite 1050
Washington, DC 20036
202 815 1098 (Telephone)
202 296 2318 (Facsimile)
nshah@advancingjustice-aajc.org
nbaron@advancingjustice-aajc.org

/s/Kimberly Leung
KIMBERLY LEUNG*
ASIAN LAW CAUCUS
55 Columbus Avenue
San Francisco, CA 94111
415 896 1701 (Telephone)
415 896 1702 (Facsimile)
kimberlyl@asianlawcaucus.org

/s/R. Adam Lauridsen
LEO L. LAM*
R. ADAM LAURIDSEN*
CONNIE P. SUNG*
CANDICE MAI KHANH NGUYEN*
RYLEE KERCHER OLM*
NIHARIKA S. SACHDEVA*
ELIZABETH A. HECKMANN*
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
rolm@keker.com
nsachdeva@keker.com
eheckmann@keker.com

Attorneys for Plaintiffs Asian Americans Advancing Justice–Atlanta, Steven J. Paik, Nora Aquino, Angelina Thuy Uddullah, and Anjali Enjeti-Sydow

**Admitted pro hac vice*

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing Private Plaintiffs' Response to State Defendants' Notice of Supplemental Authority, has been prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(B).

/s/Laurence Pulgram
Laurence Pulgram

Dated: August 2, 2024