

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

VOTE.ORG, *et al.*,

*Plaintiffs,*

v.

GEORGIA STATE ELECTION  
BOARD, *et al.*,

*Defendants,*

GEORGIA REPUBLICAN PARTY,  
INC.; and REPUBLICAN NATIONAL  
COMMITTEE,

*Intervenor-Defendants.*

Civil Action No.: 1:22-cv-01734-JPB

**INTERVENOR-DEFENDANTS' ANSWER TO PLAINTIFFS' AMENDED  
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

COMES NOW Georgia Republican Party, Inc., and Republican National Committee, Intervenor-Defendants in the above-styled action, and files this Answer<sup>1</sup> thereby placing all parties of record on notice of Intervenor-Defendants' affirmative defenses and answers to Plaintiffs' allegations.

For their Answer to Plaintiffs' Amended Complaint (CM/ECF Doc. 96) the Intervenor-Defendants ("or Intervenors")—the Georgia Republican Party, Inc. and the Republican National Committee—state as follows:

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<sup>1</sup> Intervenor-Defendants hereby expressly incorporate their foregoing Answer and all defenses asserted therein (CM/ECF Doc. 48) and attach as an Attachment to this Pleading.

## PRELIMINARY STATEMENT

Unless expressly admitted below, every allegation in the Complaint is denied. When Intervenors say something “speaks for itself,” they mean they lack sufficient information to admit or deny the allegation; because Plaintiffs cite nothing, Intervenors do not know whether the referenced material exists, is accurate, or is placed in the proper context.

## ANSWERS

1. To the extent Paragraph 1 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

2. To the extent Paragraph 2 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

3. To the extent Paragraph 3 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

4. To the extent Paragraph 4 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

5. To the extent Paragraph 5 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

6. To the extent Paragraph 6 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

7. To the extent Paragraph 7 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

8. Admitted that Plaintiffs bring this action under 52 U.S.C. § 10101 and 42 U.S.C. §§ 1983 and 1988, but denied that Plaintiffs have a valid claim under any statute.

9. Paragraph 9 contains legal arguments to which no response is required.

10. Paragraph 10 contains legal arguments to which no response is required.

11. Paragraph 11 contains legal arguments to which no response is required.

12. Paragraph 12 contains legal arguments to which no response is required.

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.

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

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

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

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

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

22. The allegations in the first and last sentence are admitted. The remainder of the paragraph contains legal arguments to which no response is required.

23. The allegations in the first sentence are admitted. Intervenors lack sufficient information to admit or deny the remaining allegations.

24. The allegations in the first sentence are admitted. Intervenors lack sufficient information to admit or deny the remaining allegations.

25. Admitted.

26. To the extent Paragraph 26 quotes from a public record, that record speaks for itself. Intervenors lack sufficient information to admit or deny any remaining allegations.

27. To the extent Paragraph 27 quotes from a public record, that record speaks for itself. Intervenors lack sufficient information to admit or deny any remaining allegations.

28. To the extent Paragraph 28 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

29. To the extent Paragraph 29 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

30. Admitted that SB 202 is now law. To the extent Paragraph 30 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

31. To the extent Paragraph 31 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

32. To the extent Paragraph 32 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

33. To the extent Paragraph 33 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

34. Intervenors repeat and re-allege their responses in Paragraphs 1 through 33.

35. The cited authority speaks for itself.

36. Paragraph 36 contains legal arguments, to which no response is required.

37. Paragraph 37 contains legal arguments, to which no response is required.

38. To the extent Paragraph 38 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

39. To the extent Paragraph 39 contains legal arguments, no response is required. Intervenors lack sufficient information to admit or deny any remaining allegations.

40. Denied.

### **RESPONSE TO PRAYER FOR RELIEF**

Intervenors deny that the Plaintiffs are entitled to their requested relief.

### **AFFIRMATIVE DEFENSES**

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

Dated: November 22, 2023

Respectfully submitted,

/s/ William Bradley Carver, Sr.

Harmeet K. Dhillon\*  
DHILLON LAW GROUP, INC.  
177 Post Street, Suite 700  
San Francisco, California 94108  
Telephone: 415.433.1700  
Facsimile: 415.520.6593  
harmeet@dhillonlaw.com

William Bradley Carver, Sr.  
Georgia Bar No. 115529  
HALL BOOTH SMITH, P.C.  
191 Peachtree Street NE, Suite 2900  
Atlanta, Georgia 30303  
(404) 954-5000  
(404) 954-5020 (Fax)

David A. Warrington\*  
Gary M. Lawkowski\*  
DHILLON LAW GROUP, INC.  
2121 Eisenhower Ave, Suite 608  
Alexandria, Virginia 22314  
Phone: 703.574.1206  
Facsimile: 415.520.6593  
dwarrington@dhillonlaw.com  
glawkowski@dhillonlaw.com

\*admitted pro hac vice

*Counsel for Intervenor-Defendants Georgia Republican Party, Inc. and  
Republican National Committee*



### **CERTIFICATE OF COMPLIANCE**

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

*/s/ William Bradley Carver, Sr.*

### **CERTIFICATE OF SERVICE**

On November 22, 2023, I e-filed this document on ECF, which will email everyone requiring service.

*/s/ William Bradley Carver, Sr.*

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