



3. The bulk of the allegations in paragraph 3 are Plaintiffs' legal conclusions to which no answer is required. To the extent that paragraph 3 quotes from historical sources, Defendants state that those sources speak for themselves and deny any allegation inconsistent with the same.

4. The bulk of the allegations in paragraph 4 are Plaintiffs' legal conclusions to which no answer is required. To the extent that paragraph 4 cites statutes passed by Congress, Defendants state that those statutes speak for themselves and deny any allegation inconsistent with the same.

5. The bulk of the allegations in paragraph 5 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that the Virginia Readmission Act speaks for itself, and Defendants deny any allegations inconsistent with the same.

6. The allegations in paragraph 6 are Plaintiffs' legal conclusions to which no answer is required.

7. The allegations in paragraph 7 are Plaintiffs' legal conclusions to which no answer is required.

8. The allegations in paragraph 8 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants deny that there "is now a national consensus against permanent disenfranchisement due to a prior felony conviction." Defendants additionally note that the Fifth Circuit case therein cited has now been reversed *en banc*. See *Hopkins v. Watson*, 108 F.4th 371 (5th Cir. 2024) (*en banc*).

9. The allegations in paragraph 9 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information about the practices of other States to admit or deny the allegations.

10. Defendants lack sufficient information to form a belief as to the truth of the factual allegations in paragraph 10 and neither admit nor deny them.

11. Defendants lack sufficient information to form a belief as to the truth of the factual allegations in paragraph 11 and neither admit nor deny them. To the extent that the allegations are Plaintiffs' legal conclusions, no answer is required.

12. Defendants admit that Glenn Youngkin is the Governor of Virginia. Defendants deny that Governor Youngkin's decisions whether to restore felons' voting rights are opaque or arbitrary. Defendants lack sufficient information to form a belief as to the truth of the remaining factual allegations in paragraph 12 and neither admit nor deny them.

13. The allegations in paragraph 13 are Plaintiffs' legal conclusions to which no answer is required.

#### **PARTIES**

14. Defendants deny that Tati Abu King was 52 years old at the time the Second Amended Complaint was filed. Defendants admit that King was convicted of a felony in December of 2018. Defendants lack sufficient information to form a belief as to the truth of the remaining factual allegations in paragraph 14 and neither admit nor deny them.

15. Defendants admit that King was convicted of a drug-possession crime in December of 2018. Defendants admit that King was released from incarceration in 2019. Defendants lack sufficient information to form a belief as to the truth of the remaining factual allegations in paragraph 15 and neither admit nor deny them.

16. Defendants admit that King was previously registered to vote and has not had his rights restored.

17. Defendants admit that King was unable to vote between 2018 and the present. Defendants lack sufficient information to determine whether King would have voted in these elections.

18. Defendants admit that King has applied for his voting rights to be restored. Defendants lack sufficient information to determine whether King would register and vote if his rights were restored.

19. Defendants deny that Toni Heath Johnson was 60 years old when the Second Amended Complaint was filed. Defendants admit that Johnson was convicted of felonies in 2021. Defendants lack sufficient information to form a belief as to the truth of the remaining factual allegations in paragraph 19 and neither admit nor deny them.

20. Defendants admit that Johnson was convicted of drug possession and distribution crimes, as well as child endangerment, and that she was released from incarceration in 2022. Defendants lack sufficient information to form a belief as to the truth of the remaining factual allegations in paragraph 20 and neither admit nor deny them.

21. Defendants admit that Johnson has been convicted of other offenses. Defendants admit that Johnson had her voting rights restored before her most recent set of felony convictions. Defendants lack sufficient information to determine whether Johnson would have voted in the 2022 midterm election had she not been disqualified. The remaining allegations in paragraph 21 are Plaintiffs' legal conclusions which require no answer.

22. Defendants admit that Johnson again applied to have her voting rights restored and was denied in 2023. Defendants lack sufficient information to determine whether Johnson would vote if her rights were restored.

23. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

24. The allegations in paragraph 24 are Plaintiffs' legal conclusions to which no answer is required. To the extent that a response is required, Defendants state that the Virginia Constitution speaks for itself and deny any allegation inconsistent with the same.

25. Defendants admit that Glenn Youngkin is the Governor of Virginia. Defendants do not address the remaining allegations in paragraph 25 because Governor Youngkin has been dismissed from this case. See *King v. Youngkin*, 122 F.4th 539 (4th Cir. 2024).

26. Defendants do not address allegations in paragraph 26 because Secretary Gee has been dismissed from the case. See *King v. Youngkin*, 122 F.4th 539 (4th Cir. 2024).

27. Defendants admit that Kelly Gee is the Secretary of the Commonwealth. Defendants do not address the remaining allegations in paragraph 27 because Secretary Gee has been dismissed from the case. See *King v. Youngkin*, 122 F.4th 539 (4th Cir. 2024).

28. Defendants admit the factual allegations in paragraph 28.

29. Defendants admit the factual allegations in paragraph 29.

30. Defendants admit the factual allegations in paragraph 30.

31. Defendants admit the factual allegations in paragraph 31.

32. Defendants admit the factual allegations in paragraph 32.

33. Defendants admit the factual allegations in paragraph 33.

34. Defendants admit the factual allegations in paragraph 34.

35. Defendants deny the factual allegations in paragraph 35.

36. Defendants admit the factual allegations in paragraph 36.

37. Defendants admit that each city or county in Virginia has a general registrar, that the general registrars process voter registration applications for residents in their particular locality, that this process includes determining under what circumstances the applicant's right to vote has

been restored, and that the general registrars must promptly notify each applicant of the acceptance or denial of their registration or transfer request. Defendants deny the remaining factual allegations in paragraph 37.

38. Defendants admit the factual allegations in paragraph 38.

39. Defendants admit that Shannon Williams was the General Registrar of Smyth County, Virginia at the time the Second Amended Complaint was filed. Plaintiffs named Shannon Williams as a defendant in her official capacity as the General Registrar of Smyth County, Virginia. Sandy C. Elswick is now the General Registrar of Smyth County, Virginia and she is automatically substituted as a party per Federal Rule of Civil Procedure 25(d).

40. The allegations in paragraph 40 are Plaintiffs' legal conclusions to which no answer is required.

#### **JURISDICTION AND VENUE**

41. The allegations in paragraph 41 are Plaintiffs' legal conclusions to which no response is required; however, to the extent a response is required, Defendants state that the cited legal authorities speak for themselves and deny any allegation inconsistent with the same.

42. The allegations in paragraph 42 are Plaintiffs' legal conclusions to which no response is required; however, to the extent a response is required, Defendants state that the cited legal authorities speak for themselves and deny any allegation inconsistent with the same.

#### **FACTS**

43. The allegations in paragraph 43 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

44. Defendants admit that the Civil War ended in April of 1865. The remaining allegations in paragraph 44 are Plaintiffs' legal conclusions to which no answer is required.

45. The bulk of the allegations in paragraph 45 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

46. The bulk of the allegations in paragraph 46 are Plaintiffs' legal conclusions to which no answer is required. To the extent that paragraph 46 quotes from historical sources, Defendants state that those sources speak for themselves and deny any allegation inconsistent with the same.

47. The bulk of the allegations in paragraph 47 are Plaintiffs' legal conclusions to which no answer is required. The statement of "one of the chairmen of the South Carolina Constitutional Convention" speaks for itself and Defendants deny any allegation inconsistent with the same. Defendants lack sufficient information to either admit or deny the remaining allegations in paragraph 47, to the extent that a response is required.

48. The allegations in paragraph 48 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that the Fourteenth Amendment speaks for itself and deny any allegation inconsistent with the same.

49. The bulk of the allegations in paragraph 49 are Plaintiffs' legal conclusions to which no answer is required. The statement of "[o]ne agent of the Freedman's Bureau" speaks for itself and Defendants deny any allegation inconsistent with the same.

50. The bulk of the allegations in paragraph 50 are Plaintiffs' legal conclusions to which no answer is required. To the extent that an answer is required, Defendants state that the historical sources cited speak for themselves and deny any allegation inconsistent with the same.

51. The allegations in paragraph 51 are Plaintiffs' legal conclusions to which no answer is required. To the extent that an answer is required, Defendants state that the Military Reconstruction Act of 1867 speaks for itself and deny any allegation inconsistent with the same.

52. The allegations in paragraph 52 are Plaintiffs' legal conclusions to which no answer is required. To the extent that an answer is required, Defendants state that the Virginia Readmission Act speaks for itself and deny any allegation inconsistent with the same.

53. The bulk of the allegations in paragraph 53 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that Senator Drake's statement speaks for itself and deny any allegations inconsistent with the same.

54. The allegations in paragraph 54 are Plaintiffs' legal conclusions to which no answer is required. To the extent that an answer is required, Defendants state that the Virginia Readmission Act speaks for itself and deny any allegation inconsistent with the same.

55. The allegations in paragraph 55 are Plaintiffs' legal conclusions to which no answer is required.

56. The bulk of the allegations in paragraph 56 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that the Alexandria Gazette's report speaks for itself and deny any allegations inconsistent with the same.

57. The first allegation in paragraph 57 is Plaintiffs' legal conclusion to which no answer is required. Defendants state that Elizabeth L. Van Lew's statements speak for themselves and deny any allegation inconsistent with the same.

58. The bulk of the allegations in paragraph 58 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that the Richmond Daily Dispatch's statements speak for themselves and deny any allegation inconsistent with the same.



59. The bulk of the allegations in paragraph 59 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that John Goode's statement speaks for itself and deny any allegations inconsistent with the same. Defendants lack sufficient information to admit or deny the reaction of the crowd to Goode's statement.

60. The bulk of the allegations in paragraph 60 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that Carter Glass's statement speaks for itself and deny any allegations inconsistent with the same.

61. The bulk of the allegations in paragraph 61 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

62. The allegations in paragraph 62 are Plaintiffs' legal conclusions to which no answer is required.

63. The bulk of the allegations in paragraph 63 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that Article II, Section I of the Virginia Constitution speaks for itself and deny any allegation inconsistent with the same.

64. The allegations in paragraph 64 are Plaintiffs' legal conclusions to which no answer is required. Defendants additionally note that the Fifth Circuit case therein cited has now been reversed *en banc*. See *Hopkins v. Watson*, 108 F.4th 371 (5th Cir. 2024) (en banc).

65. The allegations in paragraph 65 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants deny the allegations. Defendants additionally note that the Fifth Circuit case therein cited has now been reversed *en banc*. See *Hopkins v. Watson*, 108 F.4th 371 (5th Cir. 2024) (en banc).

66. The allegations in paragraph 66 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants deny the allegations. Defendants additionally note that the Fifth Circuit case therein cited has now been reversed *en banc*. See *Hopkins v. Watson*, 108 F.4th 371 (5th Cir. 2024) (en banc).

67. The allegations in paragraph 67 are Plaintiffs' legal conclusions to which no answer is required. Defendants additionally note that the Fifth Circuit case therein cited has now been reversed *en banc*. See *Hopkins v. Watson*, 108 F.4th 371 (5th Cir. 2024) (en banc).

68. The allegations in paragraph 68 are Plaintiffs' legal conclusions to which no answer is required.

69. The allegations in paragraph 69 are Plaintiffs' legal conclusions to which no answer is required. Defendants state that Article II, Section I of the Virginia Constitution speaks for itself and deny any allegation inconsistent with the same.

70. The allegations in paragraph 70 are Plaintiffs' legal conclusions to which no answer is required.

71. The allegations in paragraph 71 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

72. The allegations in paragraph 72 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

73. Defendants lack sufficient information to form a belief as to the truth of the factual allegations in paragraph 73 and neither admit nor deny them.

74. Defendants lack sufficient information to form a belief as to the truth of the factual allegations in paragraph 74 and neither admit nor deny them.

75. The bulk of the allegations in paragraph 75 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

76. The allegations in paragraph 76 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants deny the allegations.

77. Defendants admit that King was convicted of felony possession of a controlled substance with intent to distribute in December of 2018. The remaining allegations in paragraph 77 are either Plaintiffs' legal conclusions to which no answer is required or factual allegations that Defendants lack sufficient information to admit or deny.

78. Defendants admit that Johnson was convicted in 2021 for possession and distribution of controlled substances as well as child endangerment. The remaining allegations are Plaintiffs' legal conclusions to which no response is required.

79. Defendants lack sufficient information to form a belief as to the truth of the factual allegations in paragraph 79 and neither admit nor deny them.

80. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

81. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

82. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

83. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

84. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

85. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

86. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

87. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

88. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

#### **CLASS ACTION ALLEGATIONS**

89. The allegations in paragraph 89 are Plaintiffs' legal conclusions to which no answer is required.

90. The allegations in paragraph 90 are Plaintiffs' legal conclusions to which no answer is required.

91. The allegations in paragraph 91 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

92. The allegations in paragraph 92 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

93. The allegations in paragraph 93 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

94. The allegations in paragraph 94 are Plaintiffs' legal conclusions to which no answer is required.

95. The allegations in paragraph 95 are Plaintiffs' legal conclusions to which no answer is required.

96. The allegations in paragraph 96 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

97. The allegations in paragraph 97 are Plaintiffs' legal conclusions to which no answer is required; however, to the extent a response is required, Defendants lack sufficient information to admit or deny the allegations.

#### **FIRST CAUSE OF ACTION**

98. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

99. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

100. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

101. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

102. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

103. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

104. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

105. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

106. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

107. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

108. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

109. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

110. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

111. Defendants do not address the allegations regarding the Virginia Readmission Act claim under 42 U.S.C. § 1983 because it has been dismissed.

## **SECOND CAUSE OF ACTION**

112. Defendants adopt and incorporate by reference their answers to the allegations set forth herein.

113. The allegations in paragraph 113 are Plaintiffs' legal conclusions to which no answer is required. To the extent that an answer is required, Defendants state that the Supremacy Clause speaks for itself and deny any allegation inconsistent with the same.

114. The allegations in paragraph 114 are Plaintiffs' legal conclusions to which no answer is required.

115. The allegations in paragraph 115 are Plaintiffs' legal conclusions to which no answer is required. To the extent that an answer is required, Defendants state that Article II, Section 1 of the Virginia Constitution speaks for itself and deny any allegation inconsistent with the same.

116. The allegations in paragraph 116 are Plaintiffs' legal conclusions to which no answer is required. To the extent that an answer is required, Defendants state that Article II, Section 1 of the Virginia Constitution speaks for itself and deny any allegation inconsistent with the same.

117. The allegations in paragraph 117 are Plaintiffs' legal conclusions to which no answer is required.

118. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

119. The allegations in paragraph 119 are Plaintiffs' legal conclusions to which no answer is required.

120. The allegations in paragraph 120 are Plaintiffs' legal conclusions to which no answer is required.

121. The allegations in paragraph 121 are Plaintiffs' legal conclusions to which no answer is required.

122. The allegations in paragraph 122 are Plaintiffs' legal conclusions to which no answer is required.

123. Defendants do not address the allegations concerning Bridging The Gap In Virginia because it has been dismissed from the case.

124. The allegations in paragraph 124 are Plaintiffs' legal conclusions to which no answer is required.

125. The allegations in paragraph 125 are Plaintiffs' legal conclusions to which no answer is required.

126. The allegations in paragraph 126 are Plaintiffs' legal conclusions to which no answer is required.

### **THIRD CAUSE OF ACTION**

127. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

128. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

129. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

130. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

131. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

132. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

133. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.



134. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

135. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

136. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

137. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

138. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

139. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

140. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

#### **FOURTH CAUSE OF ACTION**

141. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

142. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

143. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

144. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

145. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

146. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

147. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

148. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

149. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

150. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

151. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

152. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

153. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

154. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

155. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

156. Defendants do not address the allegations regarding the Eighth Amendment claims because they have been dismissed.

**PRAYER FOR RELIEF**

A. Defendants deny that Plaintiffs are entitled to any of the relief requested in Paragraph A of the Prayer for Relief.

B. Defendants deny that Plaintiffs are entitled to any of the relief requested in Paragraph B of the Prayer for Relief.

C. Defendants deny that Plaintiffs are entitled to any of the relief requested in Paragraph C of the Prayer for Relief.

D. Defendants do not address the requested relief in Paragraph D of the Prayer for Relief because the Eighth Amendment claims have been dismissed.

E. Defendants deny that Plaintiffs are entitled to any of the relief requested in Paragraph E of the Prayer for Relief.

F. Defendants deny that Plaintiffs are entitled to any of the relief requested in Paragraph F of the Prayer for Relief.

G. Defendants deny that Plaintiffs are entitled to any of the relief requested in Paragraph G of the Prayer for Relief.

Except as otherwise expressly stated above, Defendants deny each allegation in the Second Amended Complaint.

**Affirmative Defenses**

**First Affirmative Defense**

157. Sovereign immunity bars this lawsuit.

**Second Affirmative Defense**

158. The enforcement of the Virginia Readmission Act presents a nonjusticiable political question.

**Third Affirmative Defense**

159. The Virginia Readmission Act is not enforceable by private parties.

**Fourth Affirmative Defense**

160. Plaintiffs' complaint otherwise fails to state a claim upon which relief can be granted.

**Fifth Affirmative Defense**

161. Plaintiffs fail to satisfy the criteria to establish a class action under Rule 23.

\* \* \*

Defendants reserve the right to amend their responses in this Answer and to set forth any additional defenses which may come to light or otherwise reveal themselves in the course of litigation, including during discovery and at trial.

WHEREFORE, Defendants respectfully request that the Court dismiss Plaintiffs' claims with prejudice, deny Plaintiffs' Prayer for Relief, and grant any and all other relief deemed just and proper.

Dated: January 10, 2025

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that on January 10, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties of record.

Thomas J. Sanford  
Thomas J. Sanford (VSB #95965)  
Deputy Attorney General

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