

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

VASU ABHIRAMAN, TERESA K.
CRAWFORD, LORETTA MIRAN-
DOLA, JENNIFER MOSBACHER,
ANITA TUCKER, ESSENCE JOHN-
SON, LAUREN WAITS, SUZANNE
WAKEFIELD, MICHELLE AU, JAS-
MINE CLARK, DEMOCRATIC NA-
TIONAL COMMITTEE, and DEMO-
CRATIC PARTY OF GEORGIA, INC.,

Petitioners,

v.

STATE ELECTION BOARD,

Defendant,

REPUBLICAN NATIONAL COM-
MITTEE AND GEORGIA REPUBLI-
CAN PARTY, INC.,

Applicants for Intervention.

Civil Case No. # 24CV010786

**[PROPOSED] ANSWER BY THE REPUBLICAN NATIONAL
COMMITTEE AND GEORGIA REPUBLICAN PARTY**

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**pro hac vice forthcoming*

Proposed Intervenor—the Republican National Committee and the Georgia Republican Party, Inc.—answer the Plaintiffs’ Petition. Unless expressly admitted below, every allegation in the complaint is denied. Accordingly, Intervenor state:

1. The rules adopted by the Georgia State Election Board speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

2. The rules adopted by the Georgia State Election Board speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

3. This paragraph consists of legal conclusions to which no response is required.

4. This paragraph consists of legal conclusions to which no response is required.

5. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

6. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

7. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

8. The cited statutes speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

9. This paragraph consists of legal conclusions to which no response is required.

10. The rule amendment adopted by the Georgia State Election Board speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

11. The hearing transcript and amendment record speak for themselves. The remaining allegations in this paragraph are legal conclusions to which no response is required.

12. The rule amendment adopted by the Georgia State Election Board speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

13. This paragraph consists of legal conclusions to which no response is required.

14. The cited statute speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

15. Intervenors deny that Plaintiffs are entitled to relief. This paragraph otherwise consists of legal conclusions to which no response is required.

16. Deny.

PARTIES

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

18. The cited statute speaks for itself.
19. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.
20. The cited statute speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.
21. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.
22. The cited statute speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.
23. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.
24. The cited statute speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.
25. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.
26. The cited statute speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.
27. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.
28. Intervenors lack sufficient information to admit or deny this allegation.
29. Intervenors lack sufficient information to admit or deny this allegation.

- 30. Intervenor's lack sufficient information to admit or deny this allegation.
- 31. Intervenor's lack sufficient information to admit or deny this allegation.
- 32. Intervenor's lack sufficient information to admit or deny this allegation.
- 33. Intervenor's lack sufficient information to admit or deny this allegation.
- 34. The cited statute speaks for itself. Intervenor's otherwise lack sufficient information to admit or deny this allegation.
- 35. Intervenor's lack sufficient information to admit or deny this allegation.
- 36. The cited statute speaks for itself. Intervenor's otherwise lack sufficient information to admit or deny this allegation.

STANDING

- 37. Intervenor's incorporate their prior responses.
- 38. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.
- 39. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.
- 40. The SEB rule speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.
- 41. This paragraph consists of legal conclusions to which no response is required.
- 42. This paragraph consists of legal conclusions to which no response is required.

43. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

44. This paragraph consists of legal conclusions to which no response is required.

45. This paragraph consists of legal conclusions to which no response is required.

46. This paragraph consists of legal conclusions to which no response is required.

47. This paragraph consists of legal conclusions to which no response is required.

48. This paragraph consists of legal conclusions to which no response is required.

49. This paragraph consists of legal conclusions to which no response is required.

JURISDICTION AND VENUE

50. This paragraph consists of legal conclusions to which no response is required.

51. This paragraph consists of legal conclusions to which no response is required.

FACTUAL ALLEGATIONS

52. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

53. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

54. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

55. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

56. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

57. Intervenors do not dispute that certain steps in the election process are “geared towards validating individual ballots and preventing, detecting, and remediating fraud.” This paragraph otherwise consists of legal conclusions to which no response is required.

58. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

59. This paragraph consists of legal conclusions to which no response is required.

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

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

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

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

64. The SEB minutes and petition speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

65. The petition speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

66. The petition speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

67. The petition speaks for itself.

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

69. The hearing transcript and amendment record speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

70. The hearing transcript and amendment record speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

71. The hearing transcript and amendment record speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

72. The Election Assistance Commission glossary speaks for itself. Intervenor otherwise lack sufficient information to admit or deny this allegation.

73. The Election Assistance Commission glossary speaks for itself. Intervenor otherwise lack sufficient information to admit or deny this allegation.

74. The Election Assistance Commission glossary speaks for itself. Intervenor otherwise lack sufficient information to admit or deny this allegation.

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

76. The SEB rule speaks for itself. Intervenor otherwise lack sufficient information to admit or deny this allegation.

77. The SEB rule speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

78. The SEB rule speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

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

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

81. The cited comments speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

82. Admit.

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

84. The cited social media post speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

85. The cited press release speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

86. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

87. The cited petition speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

88. The cited petition speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

89. The cited petition speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

90. The cited petition speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

91. The cited petition speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

92. The notice of proposed rulemaking speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

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

94. The cited statute and comments speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

95. Admit.

96. The cited statute and comments speak for themselves. Intervenor otherwise lack sufficient information to admit or deny this allegation.

97. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

98. This paragraph consists of legal conclusions to which no response is required.

99. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

100. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

101. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

102. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

103. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

104. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

105. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

106. The election code speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

107. This paragraph consists of legal conclusions to which no response is required.

108. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

109. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

110. This paragraph consists of legal conclusions to which no response is required.

111. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

112. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

113. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

114. This paragraph consists of legal conclusions to which no response is required.

115. The cited case speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

116. The cited case speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

117. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

118. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

119. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

**COUNT I – DECLARATORY JUDGMENT THAT
THE REASONABLE INQUIRY RULE IS INVALID**

120. Intervenors incorporate their prior responses.

121. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

122. The cited authorities speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

123. This paragraph consists of legal conclusions to which no response is required.

124. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

125. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

126. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

127. Intervenor deny that Plaintiffs are entitled to relief.

128. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

129. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

130. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

131. The cited statutes speak for themselves. This paragraph otherwise consists of legal conclusions to which no response is required.

132. The cited authority speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

133. Intervenor deny that Plaintiffs are entitled to relief. Intervenor otherwise lack sufficient information to admit or deny this allegation.

COUNT II – DECLARATORY JUDGMENT THAT THE EXAMINATION RULE IS INVALID

134. Intervenor incorporate their prior responses.

135. This paragraph consists of legal conclusions to which no response is required.

136. Intervenors deny that Plaintiffs are entitled to relief.

137. The cited statute speaks for itself. This paragraph otherwise consists of legal conclusions to which no response is required.

RESPONSE TO PRAYER FOR RELIEF

Intervenors deny that Plaintiffs are entitled to their 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.

Respectfully submitted this 2nd day of September, 2024.

/s/ William Bradley Carver, Sr.

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**pro hac vice forthcoming*

Counsel for Movant

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September, 2024, a true and correct copy of the foregoing **[PROPOSED] ANSWER** was electronically filed with the Court using the Court's eFileGA electronic filing system, which will automatically send an email notification of such filing to all attorneys of record, and was additionally served by emailing a copy to the currently known counsel of named parties and proposed intervenors as listed below:

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