

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NEW GEORGIA PROJECT, SANG
HUYNH, GEORGIA MUSLIM
VOTER PROJECT, and A. PHILLIP
RANDOLPH INSTITUTE,

Plaintiffs,

v.

BRAD RAFFENSBERGER, in his
official capacity as Georgia Secretary of
State,

JOHN FERVIER, SARA TINDALL
GHAZAL, JANICE W. JOHNSTON,
RICK JEFFARES, and JANELLE
KING, in their official capacity as
members of the Georgia State Election
Board,

COLIN McRAE, WANDA
ANDREWS, WILLIAM L. NORSE,
KATHERINE A. DURSO, and DEBRA
GEIGER, in their official capacity as
members of the Chatham County Board
of Registrars,

BARBARA LUTH, JOEL NATT,
CARLA RADZIKINAS, ANITA
TUCKER, and DAN THALIMER, in
their official capacity as members of the
Forsyth County Board of Voter
Registrations and Elections,

CIVIL ACTION FILE NO:
1:24-cv-03412-SDG

SHERRI ALLEN, AARON V. JOHNSON, MICHAEL HEEKIN, TERESA K. CRAWFORD, and JULIE ADAMS, in their official capacity as members of the Fulton County Board of Registration and Elections,

KAREN EVANS-DANIEL, ROBERT ABBOTT, JOEL HAZARD, THOMAS ELLINGTON, and MIKE KAPLAN, in their official capacity as members of the Macon-Bibb County Board of Elections,

WANDY TAYLOR, DAVID HANCOCK, LORETTA MIRANDOLA, ALICE O'LENICK, and ANTHONY RODRIGUEZ, in their official capacity as members of the Gwinnett County Board of Registrations and Elections, and

BEN JOHNSON, JAMES NEWLAND, ROY McCLAIN, JAMES A. O'BRIEN, and DEXTER WIMBISH, in their official capacity as members of the Spalding County Board of Elections and Voter Registration,

Defendants.

GEORGIA STATE CONFERENCE OF THE NAACP, GEORGIA COALITION FOR THE PEOPLE'S AGENDA, INC., and VOTERIDERS

Plaintiffs,

v.

BRAD RAFFENSBERGER, in his official capacity as Georgia Secretary of State,

JOHN FERVIER, SARA TINDALL GHAZAL, JANICE W. JOHNSTON, RICK JEFFARES, and JANELLE KING, in their official capacity as members of the Georgia State Election Board,

CHEROKEE COUNTY BOARD OF ELECTIONS AND REGISTRATIONS; GLEN JOHNSON, JULIE GLADE, SCOTT LITTLE, LARRY HAND, and JOHN WALLACE in their official capacity as members of the Cherokee County Board of Elections and Registrations;

CHATHAM COUNTY BOARD OF REGISTRARS; COLIN McRAE, WANDA ANDREWS, WILLIAM L. NORSE, KATHERINE A. DURSO, and DEBRA GEIGER, in their official capacity as members of the Chatham County Board of Registrars;

COBB COUNTY BOARD OF ELECTIONS AND REGISTRATIONS; STEVEN BRUNING, TORI SILAS, STACY EFRAT, DEBBIE FISHER, and JEN-NIFER MOSBACHER, in their official capacity as members of the Cobb County Board of Elections and Registrations;

COLUMBIA COUNTY BOARD OF ELECTIONS; ANN CUSHMAN, WANDA DUFFIE, and LARRY

WIGGINS in their official capacity as members of the Columbia County Board of Elections;

DEKALB COUNTY BOARD OF REGISTRATIONS AND ELECTIONS; VASU ABHIRAMAN, NANCY JESTER, ANTHONY LEWIS, SUSAN MOTTER, and KARLI SWIFT, in their official capacity as members of the Dekalb County Board of Registrations and Elections;

DOUGHTERY COUNTY BOARD OF ELECTIONS; FREDERICK WILLIAMS, BENNY HAND, ANNABELLE STUBBS, PRICE CORR, and JACOB CLAWSON, in their official capacity as members of the Dougherty County Board of Elections;

FORSYTH COUNTY BOARD OF VOTER REGISTRATIONS AND ELECTIONS; BARBARA LUTH, JOEL NATT, CARLA RADZIKINAS, ANITA TUCKER, and DAN THALIMER, in their official capacity as members of the Forsyth County Board of Voter Registrations and Elections;

FULTON COUNTY BOARD OF REGISTRATIONS AND ELECTIONS; SHERRI ALLEN, AARON V. JOHNSON, MICHAEL HEEKIN, TERESA K. CRAWFORD, and JULIE AD-AMS, in their official capacity as members of the Fulton County Board of Registration and Elections;

GWINNETT COUNTY BOARD OF REGISTRATIONS AND ELECTIONS; WANDY TAYLOR, DAVID HANCOCK, LORETTA MIRANDOLA, ALICE O'LENICK, and ANTHONY RODRIGUEZ, in their official capacity as members of the Gwinnett County Board of Registrations and Elections;

HALL COUNTY BOARD OF ELECTIONS AND REGISTRATIONS; JACK NOA, DAVID KENNEDY, KEN COCHRAN, JOHNNY VARNER, and GALA SHEATS in their official capacity as members of the Hall County Board of Elections and Registrations;

MACON-BIBB COUNTY BOARD OF ELECTIONS; KAREN EVANS-DANIEL, ROBERT ABBOTT, JOEL HAZARD, THOMAS ELLINGTON, and MIKE KAPLAN, in their official capacity as members of the Macon-Bibb County Board of Elections;

LEE COUNTY BOARD OF ELECTIONS AND REGISTRATIONS; MIKE SABOT, SCOTT BEELEY, WILLIE AL-LEN, CHARLES JOHNSON, and GEORGE HOUSTON, in their official capacity as members of the Lee County Board of Elections and Registration;

LOWNDES COUNTY BOARD OF ELECTIONS; RAY CORBETT, JACKIE GOOLSBY, and CARLA JORDAN in their official capacity as

members of the Lowndes County Board of Elections;

RICHMOND COUNTY BOARD OF ELECTIONS; TIM McFALLS, MARCIA BROWN, ISAAC McADAMS, SHERRY BARNES, and BETTY REECE in their official capacity as members of the Richmond County Board of Elections;

SPALDING COUNTY BOARD OF ELECTIONS AND VOTER REGISTRATION; BEN JOHNSON, JAMES NEWLAND, ROY McCLAIN, JAMES A. O'BRIEN, and DEXTER WIMBISH, in their official capacity as members of the Spalding County Board of Elections and Voter Registration;

WHITFIELD COUNTY BOARD OF ELECTIONS; STEPHEN KELEHEAR, ROB COWAN, and CAROL BYERS, in their official capacity as members of the Whitfield County Board of Elections;

WORTH COUNTY BOARD OF ELECTIONS AND REGISTRATION; FORESTINE MORRIS, DREW CHEST-NUTT, FELICIA CRAPP, MELVIN HARRIS, and JILL IVEY, in their official capacity as members of the Worth County Board of Elections and Registration;

Gwinnett County Board of Registration and Elections on behalf of a class of all

boards of registrars in the State of Georgia¹

Defendants.

SECURE FAMILIES INITIATIVE
AND THEIR MEMBERS,

Plaintiff,

v.

BRAD RAFFENSPERGER, in his official capacity as the Secretary of State of Georgia; JON FERVIER, in his official capacity as Chairman of the STATE ELECTION BOARD; SARAH TINDALL GHAZAL, JANICE JOHNSTON, RICK JEFFARES, AND JANELLE KING, in their official capacities as members of the STATE ELECTION BOARD; Gwinnett County Board of Registrations and Elections on behalf of a class of all boards of registrars in the State of Georgia

Defendants.

**CHATHAM COUNTY DEFENDANTS' SPECIAL APPEARANCE
ANSWER AND DEFENSES TO FIRST CONSOLIDATED COMPLAINT
FOR INJUNCTIVE AND DECLARATORY RELIEF**

COME NOW Defendants Colin McRae, Wanda Andrews, William L. Norse, Katherine A. Durso, and Debra Geiger all in their official capacities as members of

¹ Footnote 1 of the Amended Complaint is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in footnote 1 of the Amended Complaint.

the Chatham County Board of Registrars (collectively the “Chatham County Defendants”) and file their special appearance answer and defenses to Plaintiffs’ *Consolidated First Amended Complaint for Injunctive and Declaratory Relief* (Doc. 155) (the “Amended Complaint”), showing the Court as follows:

FIRST DEFENSE

Plaintiffs lack standing to bring all or a portion of their claims against the Chatham County Defendants, and the Court lacks subject matter jurisdiction.

SECOND DEFENSE

Plaintiffs have failed to state a claim upon which relief may be granted against the Chatham County Defendants.

THIRD DEFENSE

Chatham County Defendants were not responsible for the drafting or enactment of S.B. 189 and do not have discretion over whether to comply with validly passed state election laws. Chatham County Defendants show that they will abide by any order of this Court regarding the constitutionality of S.B. 189 or injunctive relief granted as to the enforcement of its provisions and would have done so without being named as defendants in this litigation.

FOURTH DEFENSE

Some or all of Plaintiffs’ claims are not ripe for review or are moot.

FIFTH DEFENSE

Because Plaintiffs are challenging the validity or construction of a Georgia statute, upon information and belief Plaintiffs have failed to join an indispensable party or parties.

SIXTH DEFENSE

Some or all of the claims alleged in the Amended Complaint are barred by the doctrines of estoppel, and/or waiver, and/or sovereign immunity.

SEVENTH DEFENSE

Chatham County Defendants state that they have not been properly added as a party in the lawsuit filed by Georgia State Conference of the NAACP and therefore the Court lacks jurisdiction over them in that action as consolidated herein and they assert defenses of joinder and misjoinder.

EIGHTH DEFENSE

Chatham County Defendants assert the defenses of insufficient process and/or insufficient service of process as to the lawsuit filed Georgia State Conference of the NAACP and therefore assert that the Court lacks personal jurisdiction over them in that action as consolidated herein.

ANSWER TO INTRODUCTION

1.

Paragraph 1 of the Amended Complaint, including footnote 2, is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 1 of the Amended Complaint.

2.

Paragraph 2 of the Amended Complaint, including footnote 3 contained therein, is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 2 of the Amended Complaint. Chatham County Defendants state that any document attached to the Amended Complaint as Exhibit 1 and the statute contained therein speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 2 of the Amended Complaint.

3.

Chatham County Defendants state that the statute cited at Paragraph 3 of the Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 3 of the Complaint, including those contained in footnote 4.

4.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 4 as to the election officials in Gwinnett, Forsyth and Spalding Counties, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 4 of the Amended Complaint.

5.

Chatham County Defendants state that the law cited at Paragraph 5 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

6.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

7.

Chatham County Defendants deny, as stated, the allegations contained in Paragraph 7 of the Amended Complaint.

ANSWER TO JURISDICTION AND VENUE

8.

Paragraph 8 of the Amended Complaint contains a legal conclusion to which no response is required. To the extent any response is required, Chatham County Defendants state that the Court generally has subject matter jurisdiction to the extent Plaintiffs have standing and their claims are not otherwise barred by sovereign immunity.

9.

Paragraph 9 of the Amended Complaint contains a legal conclusion to which no response is required. To the extent any response is required, Chatham County Defendants state that the Court generally has authority to issue declaratory and injunctive relief to the extent Plaintiffs have standing and their claims are not otherwise barred by sovereign immunity.

10.

To the extent the allegations in Paragraph 10 refer to Chatham County Defendants, Chatham County Defendants deny as stated the allegations in Paragraph 10. Chatham County Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations regarding other Defendants in Paragraph 10 of the Amended Complaint.

11.

Chatham County Defendants admit that venue is proper in the U.S. District Court for the Northern District of Georgia pursuant to the relevant statutes. Chatham County Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 11 of the Amended Complaint.

ANSWER TO PARTIES

I. Answer to Plaintiffs

A. Answer to Plaintiffs New Georgia Project, Georgia Muslim Voter Project, A. Philip Randolph Institute, and Sang Huynh

12.

Paragraph 12 of the Amended Complaint is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 12 of the Amended Complaint.

Answer to New Georgia Project

13.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 13, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

14.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 14, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

15.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 15, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

16.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 16, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

17.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 17, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

18.

Chatham County Defendants state that the law cited at Paragraph 18 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 18, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

Answer to The Georgia Muslim Voter Project

19.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 19, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

20.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 20, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

21.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 21, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

22.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 22, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

23.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 23, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

24.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 24, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

25.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 25, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

26.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 26, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

27.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 27, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

Answer to The A. Philip Randolph Institute

28.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 28, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

29.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 29, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

30.

Chatham County Defendants state that the statute cited at Paragraph 30 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 30, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

31.

Chatham County Defendants state that the law cited at Paragraph 31 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the

truth or falsity of the remaining allegations in Paragraph 31, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

32.

Chatham County Defendants state that the statute cited at Paragraph 32 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 32, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

Answer to Sang Huynh

33.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 33, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

34.

Chatham County Defendants state that S.B. 189 cited at Paragraph 34 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 34, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

B. Answer to Plaintiffs Georgia State Conference of the NAACP, the Georgia Coalition for the People's Agenda, Inc., and VoteRiders

35.

Paragraph 35 of the Amended Complaint is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 35 of the Amended Complaint.

Answer to Georgia State Conference of the NAACP

36.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 36, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

37.

Chatham County Defendants state that S.B. 189 cited at Paragraph 37 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 37, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

38.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 38, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

39.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 39, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

40.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 40, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

41.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 41, including those contained at footnote 5, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

42.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 42, including those contained at footnote 6, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

43.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 43, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

44.

Paragraph 44 of the Amended Complaint is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 44 of the Amended Complaint.

Answer to The Georgia Coalition for the People's Agenda, Inc.

45.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 45, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

46.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 46, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

47.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 47, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

48.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 48, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

49.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 49, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

50.

Chatham County Defendants state that S.B. 189 cited at Paragraph 50 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 50, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

51.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 51, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

52.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 52, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

53.

Chatham County Defendants state that S.B. 189 cited at Paragraph 53 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 53, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

54.

Chatham County Defendants state that S.B. 189 cited at Paragraph 54 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 54, and, therefore, neither

admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

55.

Chatham County Defendants state that S.B. 189 cited at Paragraph 55 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 55, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

56.

Chatham County Defendants state that S.B. 189 cited at Paragraph 56 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 56, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

57.

Chatham County Defendants state that S.B. 189 cited at Paragraph 57 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 57, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

58.

Paragraph 58 of the Amended Complaint is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 58 of the Amended Complaint.

59.

Paragraph 59 of the Amended Complaint is a statement of Plaintiffs' case and does not require a response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 59 of the Amended Complaint.

Answer to VoteRiders

60.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 60, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

61.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 61, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

62.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 62, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

63.

Chatham County Defendants state that S.B. 189 cited at Paragraph 63 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 63, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County

Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

64.

Chatham County Defendants state that S.B. 189 cited at Paragraph 64 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 64, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

C. Answer to Plaintiff Secure Families Initiative

65.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 65, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations, including those contained in footnote 7, also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

66.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 66, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

67.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 67, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

68.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 68, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

69.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 69, including those contained in footnote 8, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

70.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 70, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

71.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 71, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

72.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 72, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

73.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 73, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

74.

Chatham County Defendants state that S.B. 189 cited at Paragraph 74 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 74, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

75.

Chatham County Defendants state that S.B. 189 cited at Paragraph 75 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 75, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

76.

Chatham County Defendants state that S.B. 189 cited at Paragraph 76 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 76, and, therefore, neither

admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

77.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 77, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

II. Answer to Defendants

Answer to Secretary of State Brad Raffensperger

78.

Chatham County Defendants state that the statutes cited at Paragraph 78 of the Amended Complaint speak for themselves. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 78, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

Answer to State Election Board Defendants

79.

Chatham County Defendants state that the law cited at Paragraph 79 of the Amended Complaint speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 79, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

80.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 80, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

Answer to NGP Plaintiffs Group's County Defendants

81.

Chatham County Defendants admit the allegations contained in Paragraph 81 as they relate to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 81 as they relate to the other Defendants referenced therein, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants state that the remainder of Paragraph 81 of the Amended Complaint is a statement of Plaintiffs' case and does not require a

response. To the extent that a response is required, Chatham County Defendants deny, as stated, the allegations in Paragraph 81 of the Amended Complaint.

82.

Chatham County Defendants admit the allegations in Paragraph 82 of the Amended Complaint.

83.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 83, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

84.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 84, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

85.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 85, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

86.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 86, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

87.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 87, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

Answer to Seventeen County Board and Board Member NVRA Defendants

88.

Chatham County Defendants admit the allegations contained in Paragraph 88 as they relate to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 88 as they relate to the other Defendants referenced therein, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

89.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 89, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

90.

Chatham County Defendants admit the allegations in Paragraph 90 of the Amended Complaint.

91.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 91, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

92.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 92, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

93.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 93, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

94.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 94, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

95.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 95, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

96.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 96, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

97.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 97, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

98.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 98, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

99.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 99, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

100.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 100, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

101.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 101, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

102.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 102, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

103.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 103, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

104.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 104, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

105.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 105, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

106.

Chatham County Defendants state that any document attached to the Amended Complaint as Exhibit 2 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 106 of the Amended Complaint.

Answer to Class Action Allegations – Defendant Class

107.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 107 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 107, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants state that the law cited at Paragraph 107 of the Amended Complaint speaks for itself. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

108.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 108 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 108, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants state that the law cited at Paragraph 108 of the Amended Complaint speaks for itself. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

109.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 109 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 109, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants state that the law cited at Paragraph 109 of the Amended Complaint speaks for itself. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

110.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 110 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 110, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants state that the law cited at Paragraph 110 of the Amended Complaint speaks for itself. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

111.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 111 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 111, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants state that the law cited at Paragraph 111 of the Amended Complaint speaks for itself. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

112.

Chatham County Defendants deny, as stated, the allegations contained in Paragraph 112 of the Amended Complaint.

ANSWER TO STATEMENT OF FACTS

I. Answer to Requirements of the NVRA

113.

Chatham County Defendants state that the statute cited at Paragraph 113 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 113 of the Amended Complaint.

114.

Chatham County Defendants state that the statute cited at Paragraph 114 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 114 of the Amended Complaint.

115.

Chatham County Defendants state that the statute cited at Paragraph 115 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 115 of the Amended Complaint.

116.

Chatham County Defendants state that the statute cited at Paragraph 116 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 116 of the Amended Complaint.

117.

Chatham County Defendants state that the statute cited at Paragraph 117 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 117 of the Amended Complaint.

118.

Chatham County Defendants state that the statute cited at Paragraph 118 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 118 of the Amended Complaint.

119.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 119, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these

allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

120.

Chatham County Defendants can neither admit nor deny the conclusions of law contained in Paragraph 120 of the Amended Complaint, but demand strict proof of them at trial.

II. Answer to Georgia's Voter Registration Requirements

121.

Chatham County Defendants state that the section of the Georgia Constitution cited at Paragraph 121 of the Amended Complaint speaks for itself.

122.

Chatham County Defendants state that the statutes cited at Paragraph 122 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 122 of the Amended Complaint.

123.

Chatham County Defendants state that the law cited at Paragraph 123 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 123 of the Amended Complaint.

124.

Chatham County Defendants state that the law cited at Paragraph 124 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 124 of the Amended Complaint.

A. Answer to Voter Registration of Unhoused Persons Before S.B. 189

125.

Chatham County Defendants state that the law cited at Paragraph 125 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 125 of the Amended Complaint.

126.

Chatham County Defendants state that the law cited at Paragraph 126 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 126 of the Amended Complaint.

127.

Chatham County Defendants state that the law cited at Paragraph 127 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 127 of the Amended Complaint.

128.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 128, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

129.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 129, including those contained in footnote 9, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

130.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 130, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

131.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 131, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these

allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

132.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 132, including those contained in footnote 10, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

133.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 133, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

134.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 134 as they pertain to Atlanta, Fulton County, Macon-Bibb County, or the statistics represented by Plaintiffs, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

B. Answer to Voter Registration Barriers to Casting Balots for Military and Overseas Voters

135.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 135, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

136.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 136, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

137.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 137, including those contained in footnote 11, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

138.

Chatham County Defendants state that the law cited at Paragraph 138 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 138 of the Amended Complaint.

139.

Chatham County Defendants state that the statute cited at Paragraph 139 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 139 of the Amended Complaint.

140.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 140, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

141.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 141, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these

allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

142.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 142, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

143.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 143, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

144.

Chatham County Defendants state that the statutes cited at Paragraph 144 of the Amended Complaint speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 144 of the Amended Complaint.

145.

Chatham County Defendants state that the statute cited at Paragraph 145 of the Amended Complaint speaks for itself. Chatham County Defendants have

insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 145, including footnote 12, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

146.

Chatham County Defendants state that the statute cited at Paragraph 146 of the Amended Complaint speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 146, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

147.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 147, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

148.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 148, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

149.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 149, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

III. Answer to Georgia's Voter Challenge Process Pre-S.B. 189

150.

Chatham County Defendants state that the statutes cited at Paragraph 150 of the Amended Complaint speaks for themselves. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 150 of the Amended Complaint.

151.

Chatham County Defendants state that the statutes cited at Paragraph 151 of the Amended Complaint speaks for themselves. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 151 of the Amended Complaint.

152.

Chatham County Defendants state that the statute cited at Paragraph 152 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 152 of the Amended Complaint.

153.

Chatham County Defendants state that the statute cited at Paragraph 153 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 153 of the Amended Complaint.

154.

Chatham County Defendants state that the law cited at Paragraph 154 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 154 of the Amended Complaint.

155.

Chatham County Defendants state that the statute cited at Paragraph 155 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 155 of the Amended Complaint.

156.

Chatham County Defendants state that the statute cited at Paragraph 156 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 156 of the Amended Complaint.

157.

Chatham County Defendants state that the statute cited at Paragraph 157 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 157 of the Amended Complaint.

158.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 158 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 158, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

159.

Chatham County Defendants state that the statute cited at Paragraph 159 of the Amended Complaint speaks for itself. Chatham County Defendants deny upon information and belief the allegations in Paragraph 159 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 159, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

160.

Chatham County Defendants state that the statute cited at Paragraph 160 of the Amended Complaint speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 160, including those contained in footnote 13, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

161.

Chatham County Defendants state that the law cited at Paragraph 161 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 161 of the Amended Complaint.

162.

Chatham County Defendants state that the statutes cited at Paragraph 162 of the Amended Complaint speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 162 of the Amended Complaint.

163.

Chatham County Defendants state that the statute cited at Paragraph 163 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 163 of the Amended Complaint.

IV. Answer to Exponential Proliferation of Voter Challenges in Georgia from 2020 to the Present

164.

Chatham County Defendants state that the law cited at Paragraph 164 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 164 of the Amended Complaint.

165.

Chatham County Defendants state that the law cited at Paragraph 165 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 165 of the Amended Complaint.

166.

Chatham County Defendants state that the law cited at Paragraph 166 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 166 of the Amended Complaint, including those contained at footnote 14.

167.

Chatham County Defendants state that the law cited at Paragraph 167 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 167 of the Amended Complaint.

168.

Chatham County Defendants state that the law cited at Paragraph 168 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 168 of the Amended Complaint.

169.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 169, including those contained in

footnote 15, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

170.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 170, including those contained in footnotes 16 – 18, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

171.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 171, including those contained in footnotes 18, 19, and 20, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

172.

Chatham County Defendants state that the law cited at Paragraph 172 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 172, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

173.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 173, including those contained in footnote 21, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

174.

Chatham County Defendants state that any document attached to the Complaint as Exhibit 3 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 174, and, therefore, neither admit nor deny those allegations, but demand

strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

175.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 175, including those contained in footnote 23, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

175.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 176 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 176, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

177.

Chatham County Defendants deny, as stated, the allegations contained in Paragraph 177 of the Amended Complaint.

178.

Chatham County Defendants state that any document attached to the Amended Complaint as Exhibit 4 or 5 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 178 of the Amended Complaint.

179.

Chatham County Defendants state that any document attached to the Amended Complaint as Exhibit 6 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 179, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

180.

Chatham County Defendants state that any document attached to the Amended Complaint as Exhibit 7 or 8 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 180, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

V. Answer to Georgia Enacts S.B. 189

A. Answer to Sections 4 and 5 of S.B. 189

181.

Chatham County Defendants state that the statute cited at Paragraph 181 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 181 of the Amended Complaint.

182.

Chatham County Defendants state that the statute cited at Paragraph 182 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 182 of the Amended Complaint.

183.

Chatham County Defendants state that the statute cited at Paragraph 183 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 183 of the Amended Complaint.

184.

Chatham County Defendants state that the statute cited at Paragraph 184 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as

stated, the remaining allegations contained in Paragraph 184 of the Amended Complaint.

185.

Chatham County Defendants state that the law speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 185 of the Amended Complaint.

186.

Chatham County Defendants state that the statute cited at Paragraph 186 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 186 of the Amended Complaint.

B. Answer to The Process of Enacting S.B. Was Rushed and Flawed

187.

Chatham County Defendants state that the senate bills cited at Paragraph 187 of the Amended Complaint speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 187 of the Amended Complaint.

188.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 188, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

189.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 189, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

190.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 190, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

191.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 191, including those contained in footnote 30, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions

of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

192.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 192, including those contained in footnote 31, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

193.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 193, including those contained in footnote 32, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

194.

Chatham County Defendants state that the senate bill cited at Paragraph 194 of the Amended Complaint, including its date of enactment, speaks for itself.

C. Answer to Section 4's Implications for the Voter Registration of Unhoused Persons

195.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 195, including those contained in footnotes 33 – 36, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

196.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

197.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

198.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

199.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 199, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these

allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

200.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 200 as they pertain to Atlanta, Fulton County, Macon-Bibb County, or the statistics represented by Plaintiffs, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

201.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

202.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 202 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 202, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

203.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny upon information and belief the allegations in Paragraph 203 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 203, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

D. Answer to Section 5's Changes to Georgia's Voter Challenge Provisions

204.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 204, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

205.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

206.

Chatham County Defendants state that the law referenced at this Paragraph speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

207.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

208.

Chatham County Defendants state that S.B. 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

209.

Chatham County Defendants state that SB 189 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

210.

Chatham County Defendants state that S.B. 189 and the statute cited at this Paragraph speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

211.

Chatham County Defendants state that the statute cited at this Paragraph speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

212.

Chatham County Defendants state that the law cited at this Paragraph speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

213.

Chatham County Defendants state that S.B. 189 and the statute cited at this Paragraph speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

214.

Chatham County Defendants state that S.B. 189 and the statute cited at this Paragraph speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

215.

Chatham County Defendants state that S.B. 189 and the statute cited at this Paragraph speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

216.

Chatham County Defendants state that the portion of the Georgia Constitution cited at this Paragraph speaks for itself. Chatham County Defendants deny upon information and belief the allegations in Paragraph 216 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 216, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

217.

Chatham County Defendants state that the ordinances cited at this Paragraph speak for themselves. Chatham County Defendants deny upon information and belief the allegations in Paragraph 217 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 217, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

218.

Chatham County Defendants state that the ordinances cited at this Paragraph speak for themselves. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 218, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

219.

Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 219, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

220.

Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 220, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

221.

Chatham County Defendants state that S.B. 189 and the statute cited at this Paragraph speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

E. Answer to Voter Challenges Since Passage of S.B. 189

222.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 222, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

223.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 223 as they relate to the actions of Helen Strahl, including those contained in footnote 38, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 223 of the Amended Complaint

224.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 224, including those contained in footnote 39, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

225.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 225, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

226.

Chatham County Defendants state that the law cited at this Paragraph speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph.

227.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 227, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

228.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 228, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

229.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 229, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

230.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 230, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these

allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

231.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 231, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

232.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 232, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

233.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 233, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

234.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 234, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

235.

Chatham County Defendants state that S.B. 189 cited at this Paragraph speaks for itself. Chatham County Defendants deny upon information and belief the allegations in Paragraph 235 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 235, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

236.

Chatham County Defendants state that S.B. 189 cited at this Paragraph speaks for itself. Chatham County Defendants deny upon information and belief the allegations in Paragraph 236 of the Amended Complaint as to Chatham County

Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 236, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

237.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 237 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 237, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

238.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 238, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

239.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 239, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

240.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 240 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 240, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

241.

Chatham County Defendants state that the statutes cited at this Paragraph speak for themselves. Chatham County Defendants deny upon information and belief the allegations in Paragraph 241 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 241, and,

therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

242.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 242, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

ANSWER TO CAUSES OF ACTION

ANSWER TO NVRA CLAIMS:

243.

Paragraph 243 of the Amended Complaint is a statement of the applicability of this section to the enumerated counts of their Complaint and does not require a response. To the extent that a response is required, Chatham County Defendants deny the allegations in Paragraph 243.

244.

Chatham County Defendants state that the statute cited at Paragraph 244 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 244 of the Amended Complaint.

245.

Chatham County Defendants state that any document attached to the Amended Complaint as Exhibit 9 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 245 of the Amended Complaint.

246.

Chatham County Defendants state that any document attached to the Amended Complaint as Exhibit 2 speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 246 of the Amended Complaint.

247.

Chatham County Defendants state that the statute cited at Paragraph 247 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 247 of the Amended Complaint.

248.

Chatham County Defendants state that the pleading referenced at this Paragraph, including its date of filing, speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 248 of the Amended Complaint.

ANSWER TO COUNT I²

Answer to The S.B. 189 Section 5 Residency-Based Probable-Cause Provisions of Section 230 Violate the NVRA 8(d) Removal Process

52 U.S.C. § 20507(d)

(Alleged by (1) Plaintiffs Georgia NAACP and GCPA as to Defendant Raffensperger, SEB Defendants, and the Seventeen County Board Member Defendants; (2) by Plaintiff SFI as to Defendant Raffensperger, SEB Defendants, and the Defendant Class Represented by the Gwinnett County Board of Registrations and Elections; and (3) Plaintiffs NGP and APRI as to all the NGP Plaintiffs Group's respective Defendants; Plaintiff GAMVP as to all the NGP Plaintiffs Group's respective Defendants except Spalding County Defendants; and Plaintiff Huynh as to all State Defendants and Fulton County Defendants)

249.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

² Chatham County Defendants state that Appendix A referenced at footnote 42 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in footnote 42 of the Amended Complaint, including those contained in Appendix A.

250.

Chatham County Defendants state that the statute cited at Paragraph 250 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 250 of the Amended Complaint.

251.

Chatham County Defendants state that the statute cited at Paragraph 251 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 251 of the Amended Complaint.

252.

Chatham County Defendants state that the statute cited at Paragraph 252 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 252 of the Amended Complaint.

253.

Chatham County Defendants state that the statute cited at Paragraph 253 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 253 of the Amended Complaint.

254.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 254 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 254, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

255.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 255, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

256.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 256, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

257.

Chatham County Defendants state that S.B. 189 cited at Paragraph 257 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 257 of the Amended Complaint.

258.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 258 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 258, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

259.

Chatham County Defendants neither admit nor deny the allegations in Paragraph 259, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

260.

Chatham County Defendants neither admit nor deny the allegations in Paragraph 260, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial. Chatham County Defendants further state that the paragraph immediately following Paragraph 260 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT II

Answer to The S.B. 189 Section 5 “Nonresidential” Address Provision Violates the NVRA 8(b) Uniformity and Nondiscrimination Provisions

52 U.S.C. §§ 20507(b)(1)

(Alleged by (1) Plaintiffs Georgia NAACP and GCPA as to Defendant Raffensperger, SEB Defendants, and the Seventeen County Board Member Defendants; (2) by Plaintiff SFI as to Defendant Raffensperger, SEB Defendants, and the Defendant Class Represented by the Gwinnett County Board of Registrations and Elections; and (3) by the NGP Plaintiffs Group as to State Defendants and Fulton County Defendants, and by Plaintiffs NGP, GAMVP, and APRI also as to Macon-Bibb and Gwinnett County Defendants)

261.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

262.

Chatham County Defendants state that the statute cited at Paragraph 262 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 262 of the Amended Complaint.

263.

Chatham County Defendants state that the statute cited at Paragraph 263 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 263 of the Amended Complaint.

264.

Chatham County Defendants state that the law cited at Paragraph 264 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 264 of the Amended Complaint.

265.

Chatham County Defendants state that S.B. 189 cited at Paragraph 265 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 265 of the Amended Complaint.

266.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 266 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 266, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

267.

Chatham County Defendants neither admit nor deny the allegations in Paragraph 267, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

268.

Chatham County Defendants neither admit nor deny the allegations in Paragraph 268, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

269.

Chatham County Defendants neither admit nor deny the allegations in Paragraph 269, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

270.

Chatham County Defendants neither admit nor deny the allegations in Paragraph 270, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial. Chatham County Defendants further state that the paragraph immediately following Paragraph 270 of the Amended Complaint requests relief in the form of the remaining counts that requires

no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT III

Answer to Chatham, Forsyth, Gwinnett, and Spalding County Defendants' Voter Removal Practices Violate the NVRA's Requirements for Processing Voters Who Move

52 U.S.C. § 20507(d)

(Alleged by Plaintiffs NGP and APRI as to Chatham, Forsyth, Gwinnett, and Spalding County Defendants, and by Plaintiff GAMVP as to Chatham, Forsyth, and Gwinnett County Defendants)

271.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

272.

Chatham County Defendants state that the statute cited at Paragraph 272 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 272 of the Amended Complaint.

273.

Chatham County Defendants state that the statute cited at Paragraph 273 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as

stated, the remaining allegations contained in Paragraph 273 of the Amended Complaint.

274.

Chatham County Defendants deny as stated the allegations in Paragraph 274 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 274, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

275.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 275 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 275, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial. Chatham County Defendants further state that the paragraph immediately following Paragraph 275 of the Amended Complaint requests relief in the form of the

remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT IV

Answer to S.B. 189 Section 4's Unhoused Voter Mailing Address Restriction Violates the NVRA 8(b) Uniform and Nondiscriminatory Provision

52 U.S.C. § 20507(b)

(Alleged by: (1) Plaintiffs NGP and APRI as to State Defendants and Chatham, Fulton, and Macon-Bibb County Defendants, and by Plaintiff Huynh as to State Defendants and Fulton County Defendants; and (2) Plaintiffs Georgia NAACP and GCPA as to Defendant Raffensperger, SEB Defendants, and the Seventeen County Board Member Defendants)

276.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

277.

Chatham County Defendants state that the statute cited at Paragraph 277 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 277 of the Amended Complaint.

278.

Chatham County Defendants state that the law cited at Paragraph 278 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 278 of the Amended Complaint.

279.

Chatham County Defendants state that S.B. 189 cited at Paragraph 279 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 279 of the Amended Complaint. Chatham County Defendants further state that the paragraph immediately following Paragraph 279 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT V

Answer to S.B. 189 Section 4's Unhoused Voter Mailing Address Restriction Violates Multiple NVRA Notice Requirements

52 U.S.C. § 20507(a)(2), (c)(1)(B), (d)(1)-(2)

(Alleged by Plaintiffs NGP and APRI as to State Defendants and Chatham, Fulton, and Macon-Bibb County Defendants, and by Plaintiff Huynh as to State Defendants and Fulton County Defendants)

280.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

281.

Chatham County Defendants state that the statute cited at Paragraph 281 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 281 of the Amended Complaint.

282.

Chatham County Defendants state that the statute cited at Paragraph 282 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 282 of the Amended Complaint.

283.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 283 as they relate to counties other than Chatham County, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

284.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 284 as they relate to counties other than Chatham County, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial.

285.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 285, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

286.

Chatham County Defendants state that the statute cited at Paragraph 286 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 286 of the Amended Complaint.

287.

Chatham County Defendants state that S.B. 189 and the statutes cited at this Paragraph speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations of this Paragraph. Chatham County Defendants further state

that the paragraph immediately following Paragraph 287 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO CONSTITUTIONAL CLAIMS:

ANSWER TO COUNT VI

Answer to S.B. 189 Section 5's "Nonresidential Address" Provisions Violate the Funda-mental Right to Vote

42 U.S.C. § 1983; First and Fourteenth Amendments to the U.S. Constitution

(Alleged by (1) Plaintiffs Georgia NAACP, GCPA, and VoteRiders as to Defendant Raffensperger, SEB Defendants, and Defendant Class Represented by the Gwinnett County Board of Registrations and Elections; and (2) by the NGP Plaintiffs Group as to State Defendants and Fulton County Defendants, and by Plaintiffs NGP, GAMVP, and APRI also as to Macon-Bibb and Gwinnett County Defendants)

288.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

289.

Chatham County Defendants state that the statute cited at Paragraph 289 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 289 of the Amended Complaint.

290.

Chatham County Defendants state that the law cited at Paragraph 290 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 290 of the Amended Complaint.

291.

Chatham County Defendants state that S.B. 189 cited at Paragraph 291 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 291 of the Amended Complaint.

292.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 292, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

293.

Chatham County Defendants state that S.B. 189 cited at Paragraph 293 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 293 of the Amended Complaint.

294.

Chatham County Defendants state that S.B. 189 cited at Paragraph 294 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 294 of the Amended Complaint.

295.

Chatham County Defendants state that S.B. 189 cited at Paragraph 295 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 295 of the Amended Complaint.

296.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 296, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

297.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 297 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants further state that the paragraph immediately following Paragraph 297 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from

Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT VII

Answer to S.B. 189 Section 5 Violates the Fundamental Right to Vote as to Overseas and Military Voters

42 U.S.C. § 1983; First and Fourteenth Amendments to the U.S. Constitution

(Alleged by Plaintiff SFI as to Defendant Raffensperger, SEB Defendants, and Defendant Class Represented by the Gwinnett County Board of Registrations and Elections)

298.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

299.

Chatham County Defendants state that the statute cited at Paragraph 299 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 299 of the Amended Complaint.

300.

Chatham County Defendants state that the law cited at Paragraph 300 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 300 of the Amended Complaint.

301.

Chatham County Defendants state that the law cited at Paragraph 301 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 301 of the Amended Complaint.

302.

Chatham County Defendants state that S.B. 189 cited at Paragraph 302 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 302 of the Amended Complaint.

303.

Chatham County Defendants state that S.B. 189 cited at Paragraph 303 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 303 of the Amended Complaint.

304.

Chatham County Defendants state that the statute cited at Paragraph 304 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 304 of the Amended Complaint.

305.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 305, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

306.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 306, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

307.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 307, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

308.

Chatham County Defendants state that S.B. 189 cited at Paragraph 308 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 308 of the Amended Complaint.

309.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 309 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 309, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

310.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 310, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial. Chatham County Defendants further state that the paragraph immediately following Paragraph 310 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT VIII

Answer to S.B. 189 Section 4 Infringes on Unhoused Voters' Fundamental Voting Rights

42 U.S.C. § 1983; First and Fourteenth Amendments to the U.S. Constitution

(Alleged by (1) Plaintiffs Georgia NAACP, GCPA, and VoteRiders as to Defendant Raffensperger, SEB Defendants, and Defendant Class Represented by the Gwinnett County Board of Registration and Elections; and (2) Plaintiffs NGP and APRI as to SEB Defendants and Chatham, Fulton, and Macon-Bibb County Defendants, and by Plaintiff Huynh as to SEB Defendants and Fulton County Defendants)

311.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

312.

Chatham County Defendants state that the statute cited at Paragraph 312 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 312 of the Amended Complaint.

313.

Chatham County Defendants state that the law cited at Paragraph 313 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 313 of the Amended Complaint.

314.

Chatham County Defendants state that S.B. 189 cited at Paragraph 314 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 314 of the Amended Complaint.

315.

Chatham County Defendants state that S.B. 189 cited at Paragraph 315 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 315 of the Amended Complaint.

316.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 316, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

317.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 317, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

318.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 318, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

319.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 319, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

320.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 320 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants further state that the paragraph immediately following Paragraph 320 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT IX

Answer to S.B. 189 Section 5's "Nonresidential" Address Provisions Violate Due Process

42 U.S.C. § 1983; Fourteenth Amendments to the U.S. Constitution

(Alleged by Plaintiffs Georgia NAACP, GCPA, and VoteRiders as to Defendant Raffensperger, SEB Defendants, and Defendant Class Represented by the Gwinnett County Board of Registrations and Elections)

321.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

322.

Chatham County Defendants state that the statute cited at Paragraph 322 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 322 of the Amended Complaint.

323.

Chatham County Defendants state that the law cited at Paragraph 323 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 323 of the Amended Complaint.

324.

Chatham County Defendants state this Paragraph contains only conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

325.

Chatham County Defendants state that this Paragraph contains only conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

326.

Chatham County Defendants state that this Paragraph contains only conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

327.

Chatham County Defendants state that the law cited at Paragraph 327 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 327 of the Amended Complaint.

328.

Chatham County Defendants state that S.B. 189 cited at Paragraph 328 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 328 of the Amended Complaint.

329.

Chatham County Defendants state that the law cited at Paragraph 329 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 329 of the Amended Complaint.

330.

Chatham County Defendants state that S.B. 189 cited at Paragraph 330 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 330 of the Amended Complaint.

331.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 331, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

332.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 332 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants further state that the paragraph immediately following Paragraph 332 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from

Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT X

Answer to S.B. 189 Section 5 Violates Due Process as to Overseas and Military Voters

42 U.S.C. § 1983; Fourteenth Amendments to the U.S. Constitution

(Alleged by Plaintiff SFI as to Defendant Raffensperger, SEB Defendants, and Defendant Class Represented by the Gwinnett County Board of Registrations and Elections)

333.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

334.

Chatham County Defendants state that the statute cited at Paragraph 334 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 334 of the Amended Complaint.

335.

Chatham County Defendants state that the law cited at Paragraph 335 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 335 of the Amended Complaint.

336.

Chatham County Defendants state that the law cited at Paragraph 336 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 336 of the Amended Complaint.

337.

Chatham County Defendants state that the law cited at Paragraph 337 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 337 of the Amended Complaint.

338.

Chatham County Defendants state that the statute cited at Paragraph 338 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 338 of the Amended Complaint.

339.

Chatham County Defendants state that S.B. 189 cited at Paragraph 339 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 339 of the Amended Complaint.

340.

Chatham County Defendants state that the law cited at Paragraph 340 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 340 of the Amended Complaint.

341.

Chatham County Defendants state that the statute cited at Paragraph 341 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 341 of the Amended Complaint.

342.

Chatham County Defendants state that the law cited at Paragraph 342 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 342 of the Amended Complaint.

343.

Chatham County Defendants state that the law cited at Paragraph 343 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 343 of the Amended Complaint.

344.

Chatham County Defendants state that the law cited at Paragraph 344 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 344 of the Amended Complaint.

345.

Chatham County Defendants state that S.B. 189 cited at Paragraph 345 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 345 of the Amended Complaint.

346.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 346, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

347.

Chatham County Defendants state that S.B. 189 cited at Paragraph 347 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 347 of the Amended Complaint.

348.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 348 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 348, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

349.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 349, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial. Chatham County Defendants further state that the paragraph immediately following Paragraph 349 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO COUNT XI

Answer to S.B. 189 Section 5 Violates the Equal Protection Clause of the Fourteenth Amendment

42 U.S.C. § 1983; Fourteenth Amendments to the U.S. Constitution

(Alleged by Plaintiffs SFI as to as to Defendant Raffensperger, SEB Defendants, and Defendant Class Represented by the Gwinnett County Board of Registrations and Elections)

350.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

351.

Chatham County Defendants state that the statute cited at Paragraph 351 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 351 of the Amended Complaint.

352.

Chatham County Defendants state that the law cited at Paragraph 352 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 352 of the Amended Complaint.

353.

Chatham County Defendants state that the law cited at Paragraph 353 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 353 of the Amended Complaint.

354.

Chatham County Defendants state that the statutes cited at Paragraph 354 of the Amended Complaint speak for themselves. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 354 of the Amended Complaint.

355.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 355 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 355, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

356.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 356, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

357.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 357 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 357, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

358.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 358, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

359.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 359, and, therefore, neither admit nor

deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial. Chatham County Defendants further state that the paragraph immediately following Paragraph 359 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

ANSWER TO CIVIL RIGHTS ACT CLAIM:

ANSWER TO COUNT XII

Answer to S.B. 189 Section 5 Violates Title I of the Civil Rights Act

42 U.S.C. § 1983; 52 U.S.C. § 10101(a)(2)(A)

(Alleged by: (1) Plaintiff SFI as to Defendant Raffensperger, SEB Defendants, and Defendant Class Represented by the Gwinnett County Board of Registrations and Elections; and (2) the NGP Plaintiffs Group as to State Defendants and Fulton County Defendants, and by NGP, GAMVP, and APRI also as to Macon-Bibb and Gwinnett County Defendants)

360.

Chatham County Defendants incorporate the foregoing paragraphs as if fully set forth herein by reference.

361.

Chatham County Defendants state that the statute cited at Paragraph 361 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 361 of the Amended Complaint.

362.

Chatham County Defendants state that the law cited at Paragraph 362 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 362 of the Amended Complaint.

363.

Chatham County Defendants state that the statute cited at Paragraph 363 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 363 of the Amended Complaint.

364.

Chatham County Defendants state that the law cited at Paragraph 364 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 364 of the Amended Complaint.

365.

Chatham County Defendants state that the law cited at Paragraph 365 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 365 of the Amended Complaint.

366.

Chatham County Defendants state that S.B. 189 cited at Paragraph 366 of the Amended Complaint speaks for itself. Chatham County Defendants deny, as stated, the remaining allegations contained in Paragraph 366 of the Amended Complaint.

367.

Chatham County Defendants deny upon information and belief the allegations in Paragraph 367 of the Amended Complaint as to Chatham County Defendants. Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 367, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

368.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 368, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these

allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial.

369.

Chatham County Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 369, and, therefore, neither admit nor deny those allegations, but demand strict proof of them at trial. To the extent these allegations also contain conclusions of law, Chatham County Defendants neither admit nor deny the allegations, but demand strict proof of them at trial. Chatham County Defendants further state that the paragraph immediately following Paragraph 369 of the Amended Complaint requests relief in the form of the remaining counts that requires no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

370.

Except as expressly admitted to or denied, Chatham County Defendants deny all the allegations contained in the Amended Complaint.

ANSWER TO PRAYER FOR RELIEF

371.

The paragraph immediately following Paragraph 369 of the Amended Complaint, including subparagraphs (a)-(i) contains a request for relief that requires

no response. To the extent a response is required from Chatham County Defendants, Chatham County Defendants deny that the requested relief is justified or appropriate.

WHEREFORE, having fully listed their defenses and having fully answered the Amended Complaint, Chatham County Defendants pray as follows:

- (a) That judgment be entered in favor of Chatham County Defendants and against Plaintiffs on the Amended Complaint;
- (b) That the costs of this action, including attorney fees, be cast against Plaintiffs; and
- (c) That the Court grant such other and further relief as it may deem just and proper.

**CHATHAM COUNTY DEFENDANTS DEMAND TRIAL BY JURY
ON ALL ISSUES SO TRIABLE.**

This the 17th day of January, 2025

FREEMAN MATHIS & GARY, LLP

/s/ A. Ali Sabzevari

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Defendants***

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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing to the Clerk of Court using the CM/ECF system which will automatically send electronic mail notification of such filing to all counsel of record who are CM/ECF participants.

This 17th day of January, 2025.

/s/ A. Ali Sabzevari

A. Ali Sabzevari

Georgia Bar No. 941527

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