

**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 AN- )  
DREWS, 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 )

No. 1:24-cv-03412-SDG

Complaint – Class Action

CONSOLIDATED FIRST  
AMENDED COMPLAINT  
FOR INJUNCTIVE AND  
DECLARATORY RELIEF

**Section 8 of the National Voter  
Registration Act of 1993 (52 U.  
S.C. § 20507); First and Four-  
teenth Amendments to the  
United States Const**

Registrations and Elections, )  
)  
SHERRI ALLEN, AARON V. )  
JOHNSON, MICHAEL HEEKIN, TE- )  
RESA 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. )  
)  

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 )  
GEORGIA STATE CONFERENCE OF )  
THE NAACP, GEORGIA )

COALITION FOR THE PEOPLE’S )  
AGENDA, INC., and VOTERIDERS )  
 )  
Plaintiffs, )  
v. )  
 )  
BRAD RAFFENSPERGER, 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 capac- )  
ity 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 ELECT- )  
IONS 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 )  
REGSTRATIONS 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 JACOBCLAWSON, )  
in their official capacity as members of the )  
Doughtery 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 REG- )  
 ISTRATIONS AND ELECTIONS; )  
 SHERRI ALLEN, AARON V. JOHNSON, )  
 MICHAEL HEEKIN, TE- RESA K. )  
 CRAWFORD, and JULIE ADAMS, in )  
 their official capacity as mem- bers 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 ROD- )  
 RIGUEZ, in their official capacity as )  
 members of the Gwinnett County Board )  
 of Registrations and Elections; )

HALL COUNTY BOARD OF ELEC- )  
 TIONS 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 ELEC- )  
 TIONS 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 REGISTRA- )  
 TION; BEN JOHNSON, JAMES NEW- )

LAND, 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 ELEC- )  
 TIONS AND REGISTRATION; FOR- )  
 ESTINE 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 Registra- )  
 tion; Gwinnett County Board of Regi- )  
 stration and Elections on behalf of a class )  
 of all boards of registrars in the State of )  
 Geor- gia<sup>1</sup>, )

Defendants. )

SECURE FAMILIES INITIATIVE )  
 AND THEIR MEMBERS, )

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<sup>1</sup> Only with respect to Plaintiffs Georgia NAACP, GCPA, and VoteRiders' constitutional claims.

Plaintiffs, )  
 )  
 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. )

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**THE SPALDING DEFENDANT’S ANSWER AND DEFENSES TO**  
**THE NEW GEORGIA PROJECT’S, ET. AL.’s**  
**CONSOLIDATED FIRST AMENDED COMPLAINT**

COME NOW, Defendants Ben Johnson, James Newland, Roy McClain, James A. O’Brien, and Dexter Wimbish, in their official capacities, as Members (current and former) of the Spalding County Board of Elections and Voter Registration



(collectively, the “Spalding County Defendants”)<sup>2</sup> and submit their Answer and Defenses to the Consolidated First Amended Complaint (1:24-cv-03412-SDG) submitted by The New Georgia Project, A. Phillip Randolph Institute, the Georgia State Conference of The NAACP Georgia Coalition For The People’s Agenda, Inc., Voteriders, Secure Families Initiative and Their Members (collectively, “Plaintiffs”), by showing the Court as follows:<sup>3</sup>

### **AFFIRMATIVE DEFENSES**

#### **FIRST DEFENSE**

Plaintiffs lack standing to bring all or a portion of their claims against the Spalding County Defendants.

#### **SECOND DEFENSE**

Plaintiffs fail to state a claim upon which relief may be granted as to the Spalding County Defendants.

#### **THIRD DEFENSE**

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<sup>2</sup> Defendants Roy McClain and James A. O’Brien are no longer members of the Spalding County Board of Elections and Voter Registration. The Spalding County Defendants consent to substitution of the new members, Chris Piland and Lee Howell, in their official capacities.

<sup>3</sup> The Spalding County Defendants also move to dismiss Plaintiffs’ Amended Complaint on the grounds set forth in that Motion, but file their answer here out of an abundance of caution

The Spalding 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. The Spalding 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 a defendant in this litigation.

**ANSWER TO THE CONSOLIDATED FIRST AMENDED COMPLAINT**

The Spalding County Defendants respond to numbered paragraphs of Plaintiffs' Consolidated First Amended Complaint ("Complaint") as follows:

1.

The Spalding County Defendants admit the procedural facts alleged concerning Consolidation Order, ECF 137. The remaining allegations allege only what Plaintiff will allege, and what those allegations support, i.e. the requested relief. As such, said Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations contained in Paragraph 1 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

2.

The allegations contained in Paragraph 2 of Plaintiffs' Complaint are merely

Plaintiffs' restatement of, and legal conclusions regarding, SB 189. To the extent that Plaintiffs are alleging or implying wrongdoing by the Spalding County Defendants through such restatement of law, the Spalding County Defendants deny any such allegations and/or implications.

3.

The allegations contained in Paragraph 3 of Plaintiffs' Complaint are merely Plaintiffs' restatement of Section 8(d) of the National Voter Registration Act of 1993. To the extent that Plaintiffs are alleging or implying wrongdoing by the Spalding County Defendants through such restatement of law, the Spalding County Defendants deny any such allegations and/or implications.

4.

In response to Paragraph 4 of Plaintiffs' Complaint, the Spalding County Defendants deny that they have purged any voters from voting rolls in the manner alleged by the Defendants. As to the remaining allegations, the Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations contained in Paragraph 4 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

5.

The allegations contained in Paragraph 5 of Plaintiffs' Complaint are merely Plaintiffs' restatement of, and legal conclusions regarding, SB 189. To the extent that Plaintiffs are alleging or implying wrongdoing by the Spalding County Defendants through such restatement of law, the Spalding County Defendants deny any such allegations and/or implications.

6.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of any of the allegations contained in Paragraph 6 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

7.

The Spalding County Defendants deny any and all allegations in Paragraph 7 of Plaintiffs' Complaint that the Spalding County Defendants unlawfully removed any voters from the Spalding County voter roll(s), nor that they will unlawfully remove any voters in the future. The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations contained in Paragraph 7 of Plaintiffs' Complaint, and, those allegations are therefore denied.

8.

The Spalding County Defendants response to the allegations contained in Paragraph 8 of the Plaintiffs' Complaint is that 28 U.S.C §§ 1983, 1988, 1343(a(3)-(4), and 1357 speak for themselves. That said, the Spalding County Defendants admit that the Court has subject matter jurisdiction over but are without knowledge or information sufficient to form a belief as to whether such relief would be appropriate in this case and those allegations are denied.

9.

The Spalding County Defendants response to the allegations contained in Paragraph 9 of the Plaintiffs' Complaint is that 28 U.S.C §§ 2201 and 2202 speak for themselves. That said, the Spalding County Defendants admit that the Court has authority to enter declaratory judgments but are without knowledge or information sufficient to form a belief as to whether such relief would be appropriate in this case and those allegations are therefore denied.

10.

The Spalding County Defendants admit the allegations contained in Paragraph 9 of Plaintiffs' Complaint so far as the Spalding County Defendants have been properly served and are being sued in their official capacities. But the Spalding

County Defendants deny that the Court has jurisdiction over some or all of Plaintiffs' claims because Plaintiffs' lack standing to bring suit against the Spalding County Defendants. The Spalding County Defendants admit that the Court otherwise has jurisdiction to hear questions regarding the Constitutionality of laws and violations of Federal law.

11.

The Spalding County Defendants response to the allegations contained in Paragraph 11 of the Plaintiffs' Complaint is that 28 U.S.C §§ 1391(b)(1) and 1391(b)(2), along with Northern District of Georgia Rule 3.1, speak for themselves. But the Spalding County Defendants deny that the Court has jurisdiction over some or all of Plaintiffs' claims because Plaintiffs' lack standing to bring suit against the Spalding County Defendants. The Spalding County Defendants admit that the Court otherwise has jurisdiction to hear questions regarding the Constitutionality of laws and violations of Federal law.

12.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 12 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

13.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 13 of Plaintiffs' Complaint regarding the incorporation or business activities of Plaintiff New Georgia Project. As such, the Spalding County Defendants also have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 13 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

14.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 14 of Plaintiffs' Complaint regarding the business activities of Plaintiff New Georgia Project. As such, the Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 14 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

15.

The Spalding County Defendants deny any and all allegations in Paragraph 15 of Plaintiffs' Complaint that it has, or will, enforce any unlawful provisions of Georgia law. The Spalding County Defendants have insufficient knowledge to

determine the truth or falsity of the remaining allegations contained in Paragraph 15 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

16.

The Spalding County Defendants deny any and all allegations in Paragraph 16 of Plaintiffs' Complaint that it has, or will, enforce any unlawful provisions of Georgia law. The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations contained in Paragraph 16 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

17.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 17 of Plaintiffs' Complaint regarding the business activities of Plaintiff New Georgia Project, and can neither admit nor deny those allegations, but demand strict proof of them at trial. The Spalding County Defendants also have insufficient knowledge to determine the truth or falsity of remaining allegations in Paragraph 17 of Plaintiffs' Complaint, as those allegations are therefore denied.

18.

The Spalding County Defendants deny any and all allegations in Paragraph



18 of Plaintiffs' Complaint that it has, or will, enforce any unlawful provisions of Georgia law. The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations contained in Paragraph 18 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

19.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 19 of Plaintiffs' Complaint regarding the incorporation or business activities of Plaintiff Georgia Muslim Voter Project. As such, the Spalding County Defendants also have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 19 of Plaintiffs' Complaint, and, therefore, those allegations are denied.

20.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 20 of Plaintiffs' Complaint regarding the incorporation or business activities of Plaintiff Georgia Muslim Voter Project and those allegations are therefore denied.

21.

The Spalding County Defendants have insufficient knowledge to determine

the truth or falsity of the allegations contained in Paragraph 21 of Plaintiffs' Complaint, and, those allegations are therefore denied.

22.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 22 of Plaintiffs' Complaint, and, those allegations are therefore denied.

23.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 23 of Plaintiffs' Complaint, and, those allegations are therefore denied.

24.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 24 of Plaintiffs' Complaint, and, those allegations are therefore denied.

25.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 25 of Plaintiffs' Complaint, and, those allegations are therefore denied.

26.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 26 of Plaintiffs' Complaint, and, those allegations are therefore denied.

27.

The Spalding County Defendants deny any and all allegations in Paragraph 27 of Plaintiffs' Complaint that it has, or will, enforce any unlawful provisions of Georgia law. The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations contained in Paragraph 27 of Plaintiffs' Complaint, and, those allegations are therefore denied.

28.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 28 of Plaintiffs' Complaint, and, those allegations are therefore denied.

29.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 29 of Plaintiffs' Complaint, and, those allegations are therefore denied.

30.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 30 of Plaintiffs' Complaint, and, those allegations are therefore denied.

31.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 31 of Plaintiffs' Complaint, and, those allegations are therefore denied.

32.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 32 of Plaintiffs' Complaint, and, those allegations are therefore denied.

33.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 33 of Plaintiffs' Complaint, and, those allegations are therefore denied.

34.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 34 of Plaintiffs' Complaint, and, those allegations are therefore denied.

35.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 35 of Plaintiffs' Complaint, and, those allegations are therefore denied.

36.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 36 of Plaintiffs' Complaint, and, those allegations are therefore denied.

37.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 37 of Plaintiffs' Complaint, and, those allegations are therefore denied.

38.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 38 of Plaintiffs' Complaint, and, those allegations are therefore denied.

39.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 39 of Plaintiffs' Complaint, and, those allegations are therefore denied.

40.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 40 of Plaintiffs' Complaint, and, those allegations are therefore denied.

41.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 41 of Plaintiffs' Complaint, and, those allegations are therefore denied.

42.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 42 of Plaintiffs' Complaint, and, those allegations are therefore denied.

43.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 43 of Plaintiffs' Complaint, and, those allegations are therefore denied.

44.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 44 of Plaintiffs' Complaint, and, those allegations are therefore denied.

45.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 45 of Plaintiffs' Complaint, and, those allegations are therefore denied.

46.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 46 of Plaintiffs' Complaint, and, those allegations are therefore denied.

47.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 47 of Plaintiffs' Complaint, and, those allegations are therefore denied.

48.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 48 of Plaintiffs' Complaint, and, those allegations are therefore denied.

49.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 49 of Plaintiffs' Complaint, and, those allegations are therefore denied.

50.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 50 of Plaintiffs' Complaint, and, those allegations are therefore denied.

51.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 51 of Plaintiffs' Complaint, and, those allegations are therefore denied.



52.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 52 of Plaintiffs' Complaint, and, those allegations are therefore denied.

53.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 53 of Plaintiffs' Complaint, and, those allegations are therefore denied.

54.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 54 of Plaintiffs' Complaint, and, those allegations are therefore denied.

55.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 55 of Plaintiffs' Complaint, and, those allegations are therefore denied.

56.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 56 of Plaintiffs' Complaint, and, those allegations are therefore denied.

57.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 57 of Plaintiffs' Complaint, and, those allegations are therefore denied.

58.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 58 of Plaintiffs' Complaint, and, those allegations are therefore denied.

59.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 59 of Plaintiffs' Complaint, and, those allegations are therefore denied.

60.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 60 of Plaintiffs' Complaint, and, those allegations are therefore denied.

61.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 61 of Plaintiffs' Complaint, and, those allegations are therefore denied.

62.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 62 of Plaintiffs' Complaint, and, those allegations are therefore denied.

63.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 63 of Plaintiffs' Complaint, and, those allegations are therefore denied.

64.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 64 of Plaintiffs' Complaint, and, those allegations are therefore denied.

65.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 65 of Plaintiffs' Complaint, and, those allegations are therefore denied.

66.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 6 of Plaintiffs' Complaint, and, those allegations are therefore denied.

67.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 67 of Plaintiffs' Complaint, and, those allegations are therefore denied.

68.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 68 of Plaintiffs' Complaint, and, those allegations are therefore denied.

69.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 69 of Plaintiffs' Complaint, and, those allegations are therefore denied.

70.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 70 of Plaintiffs' Complaint, and, those allegations are therefore denied.

71.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 71 of Plaintiffs' Complaint, and, those allegations are therefore denied.

72.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 72 of Plaintiffs' Complaint, and, those allegations are therefore denied.

73.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 73 of Plaintiffs' Complaint, and, those allegations are therefore denied.

74.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 74 of Plaintiffs' Complaint, and, those allegations are therefore denied.

75.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 75 of Plaintiffs' Complaint, and, those allegations are therefore denied.

76.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 76 of Plaintiffs' Complaint, and, those allegations are therefore denied.

77.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 7 of Plaintiffs' Complaint, and, those allegations are therefore denied.

78.

The Spalding County Defendants admit that Brad Raffensburger is the Georgia Secretary of State. The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the remaining

allegations contained in Paragraph 41 of Plaintiffs' Complaint, and, those allegations are therefore denied.

79.

The Spalding County Defendants admit that John Fervier, Sara Tindall Ghazal, Janice W. Johnston, Rick Jeffares, and Janelle King are members of the State Election Board. The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations contained in Paragraph 41 of Plaintiffs' Complaint, and, those allegations are therefore denied.

80.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 80 of Plaintiffs' Complaint, and, those allegations are therefore denied.

81.

The Spalding County Defendants admit that they are being sued by the Plaintiffs "NGP" and "APRI." The remaining allegations, merely relate which respective Plaintiffs are suing which respective Defendants, but in the abundance of caution, the Spalding County Defendants state that they have insufficient knowledge

or information sufficient to form a belief as to the truth or falsity of the remaining allegations contained in Paragraph 81 of Plaintiffs' Complaint, and, those allegations are therefore denied.

82.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 82 of Plaintiffs' Complaint, and, those allegations are therefore denied.

83.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 83 of Plaintiffs' Complaint, and, those allegations are therefore denied.

84.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 84 of Plaintiffs' Complaint, and, those allegations are therefore denied.

85.

The Spalding County Defendants admit that Ben Johnson, James Newland, and Dexter Wimbish are members of the Spalding County Board of Elections and Voter



Registration. The Spalding County Defendants deny that Roy McClain and James A. O'Brien are current members of the Spalding County Board of Elections and Voter Registration. The Spalding County Defendants admit that Ben Johnson, James Newland, and Dexter Wimbish are sued in their official capacities only.

86.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 86 of Plaintiffs' Complaint, and, those allegations are therefore denied.

87.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 87 of Plaintiffs' Complaint, and, those allegations are therefore denied.

88.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 88 of Plaintiffs' Complaint, and, those allegations are therefore denied.

89.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 89 of Plaintiffs' Complaint, and, those allegations are therefore denied.

90.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 90 of Plaintiffs' Complaint, and, those allegations are therefore denied.

91.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 91 of Plaintiffs' Complaint, and, those allegations are therefore denied.

92.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 92 of Plaintiffs' Complaint, and, those allegations are therefore denied.

93.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 93 of Plaintiffs' Complaint, and, those allegations are therefore denied.

94.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 94 of Plaintiffs' Complaint, and, those allegations are therefore denied.

95.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 95 of Plaintiffs' Complaint, and, those allegations are therefore denied.

96.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 96 of Plaintiffs' Complaint, and, those allegations are therefore denied.

97.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 97 of Plaintiffs' Complaint, and, those allegations are therefore denied.

98.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 98 of Plaintiffs' Complaint, and, those allegations are therefore denied.

99.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 9 of Plaintiffs' Complaint, and, those allegations are therefore denied.

100.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 100 of Plaintiffs' Complaint, and, those allegations are therefore denied.

101.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 101 of Plaintiffs' Complaint, and, those allegations are therefore denied.

102.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 102 of Plaintiffs' Complaint, and, those allegations are therefore denied.

103.

The Spalding County Defendants admits that the Spalding County Board of Elections is a body created by Georgia state law to conduct elections and oversee voter registration in Spalding County. Spalding County Defendants further admit that Ben Johnson, James Newland, and Dexter Wimbish are members of the Spalding County Board of Elections and are being sued in their official capacity. Spalding County Defendants deny that Roy McClain and James A. O'Brien are current members of the Spalding County Board of Elections.

104.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 104 of Plaintiffs' Complaint, and, those allegations are therefore denied.

105.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 105 of Plaintiffs' Complaint, and, those allegations are therefore denied.

106.

The Spalding County Defendants admit that the correspondence attached as

Exhibit 2 to Plaintiff's Amended Complaint purports to give notice of NVRA violations, but has insufficient knowledge or information sufficient to form a belief as to whether said correspondence provides legally sufficient notice as required by the NVRA and any such allegation is denied.

107.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 107 of Plaintiffs' Complaint, and, those allegations are therefore denied.

108.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 108 of Plaintiffs' Complaint, and, those allegations are therefore denied.

109.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 109 of Plaintiffs' Complaint, and, those allegations are therefore denied.

110.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 110 of Plaintiffs' Complaint, and, those allegations are therefore denied.

111.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 111 of Plaintiffs' Complaint, and, those allegations are therefore denied.

112.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 112 of Plaintiffs' Complaint, and, those allegations are therefore denied.

### **STATEMENT OF FACTS**

#### **I. Requirements of the NVRA**

113.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 113 of Plaintiffs' Complaint, and, those allegations are therefore denied.

114.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 114 of Plaintiffs' Complaint, and, those allegations are therefore denied.

115.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 115 of Plaintiffs' Complaint, and, those allegations are therefore denied.

116.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 116 of Plaintiffs' Complaint, and, those allegations are therefore denied.

117.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 117 of Plaintiffs' Complaint, and, those allegations are therefore denied.

118.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 118 of Plaintiffs' Complaint, and, those allegations are therefore denied.

119.

The Spalding County Defendants have insufficient knowledge or information



sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 119 of Plaintiffs' Complaint, and, those allegations are therefore denied.

120

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 120 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## **II. Georgia's Voter Registration Requirements**

121.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 121 of Plaintiffs' Complaint, and, those allegations are therefore denied.

122.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 122 of Plaintiffs' Complaint, and, those allegations are therefore denied.

123.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 123 of Plaintiffs' Complaint, and, those allegations are therefore denied.

124.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 124 of Plaintiffs' Complaint, and, those allegations are therefore denied.

**A. Voter Registration of Unhoused Persons Before SB 189**

125.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 125 of Plaintiffs' Complaint, and, those allegations are therefore denied.

126.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 126 of Plaintiffs' Complaint, and, those allegations are therefore denied.

127.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 127 of Plaintiffs' Complaint, and, those allegations are therefore denied.

128.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 128 of Plaintiffs' Complaint, and, those allegations are therefore denied.

129.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 129 of Plaintiffs' Complaint, and, those allegations are therefore denied.

130.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 130 of Plaintiffs' Complaint, and, those allegations are therefore denied.

131.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 131 of Plaintiffs' Complaint, and, those allegations are therefore denied.

132.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 132 of Plaintiffs' Complaint, and, those allegations are therefore denied.

133.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 133 of Plaintiffs' Complaint, and, those allegations are therefore denied.

134.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 134 of Plaintiffs' Complaint, and, those allegations are therefore denied.

135.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 135 of Plaintiffs' Complaint, and, those allegations are therefore denied.

136.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 41 of Plaintiffs' Complaint, and, those allegations are therefore denied.

137.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 137 of Plaintiffs' Complaint, and, those allegations are therefore denied.

138.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 138 of Plaintiffs' Complaint, and, those allegations are therefore denied.

139.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 139 of Plaintiffs' Complaint, and, those allegations are therefore denied.

140.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 140 of Plaintiffs' Complaint, and, those allegations are therefore denied.

141.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 141 of Plaintiffs' Complaint, and, those allegations are therefore denied.

142.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 142 of Plaintiffs' Complaint, and, those allegations are therefore denied.

143.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 143 of Plaintiffs' Complaint, and, those allegations are therefore denied.

144.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 144 of Plaintiffs' Complaint, and, those allegations are therefore denied.

145.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 145 of Plaintiffs' Complaint, and, those allegations are therefore denied.

146.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 146 of Plaintiffs' Complaint, and, those allegations are therefore denied.

147.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 147 of Plaintiffs' Complaint, and, those allegations are therefore denied.

148.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 148 of Plaintiffs' Complaint, and, those allegations are therefore denied.

149.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 149 of Plaintiffs' Complaint, and, those allegations are therefore denied.

150.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 150 of Plaintiffs' Complaint, and, those allegations are therefore denied.

151.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 151 of Plaintiffs' Complaint, and, those allegations are therefore denied.

152.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 152 of Plaintiffs' Complaint, and, those allegations are therefore denied.

153.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 153 of Plaintiffs' Complaint, and, those allegations are therefore denied.

154.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 154 of Plaintiffs' Complaint, and, those allegations are therefore denied.



155.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 155 of Plaintiffs' Complaint, and, those allegations are therefore denied.

156.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 156 of Plaintiffs' Complaint, and, those allegations are therefore denied.

157.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 157 of Plaintiffs' Complaint, and, those allegations are therefore denied.

158.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 158 of Plaintiffs' Complaint, and, those allegations are therefore denied.

159.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 159 of Plaintiffs' Complaint, and, those allegations are therefore denied.

160.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 160 of Plaintiffs' Complaint, and, those allegations are therefore denied.

161.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 161 of Plaintiffs' Complaint, and, those allegations are therefore denied.

162.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 162 of Plaintiffs' Complaint, and, those allegations are therefore denied.

163.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 163 of Plaintiffs' Complaint, and, those allegations are therefore denied.

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

164.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 164 of Plaintiffs' Complaint, and, those allegations are therefore denied.

165.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 165 of Plaintiffs' Complaint, and, those allegations are therefore denied.

166.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 166 of Plaintiffs' Complaint, and, those allegations are therefore denied.

167.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 167 of Plaintiffs' Complaint, and, those allegations are therefore denied.

168.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 168 of Plaintiffs' Complaint, and, those allegations are therefore denied.

169.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 169 of Plaintiffs' Complaint, and, those allegations are therefore denied.

170.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 170 of Plaintiffs' Complaint, and, those allegations are therefore denied.

171.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 171 of Plaintiffs' Complaint, and, those allegations are therefore denied.

172.

The Spalding County Defendants have insufficient knowledge to determine the

truth or falsity of the allegations contained in Paragraph 172 of Plaintiffs' Complaint regarding Marybelle Hodges and her alleged actions and/or omissions, and, therefore, those allegations are denied. The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the remaining allegations contained in Paragraph 172 of Plaintiffs' Complaint, and, those allegations are therefore denied.

173.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 17341 of Plaintiffs' Complaint, and, those allegations are therefore denied.

174.

The Spalding County Defendants admit that at least one individual has challenged voter registrations and that certain voters were removed at an August 9, 2022 hearing. The remainder of the paragraph is denied as stated.

175.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 175 of Plaintiffs' Complaint, and, those allegations are therefore denied.

176.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 176 of Plaintiffs' Complaint, and, those allegations are therefore denied.

177.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 177 of Plaintiffs' Complaint, and, those allegations are therefore denied.

178.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 178 of Plaintiffs' Complaint, and, those allegations are therefore denied.

179.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 179 of Plaintiffs' Complaint, and, those allegations are therefore denied.

180.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 180 of Plaintiffs' Complaint, and, those allegations are therefore denied.

**V. Georgia Enacts S.B. 189**

**A. Sections 4 and 5 of S.B. 189**

181.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 181 of Plaintiffs' Complaint, and, those allegations are therefore denied.

182.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 182 of Plaintiffs' Complaint, and, those allegations are therefore denied.

183.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 183 of Plaintiffs' Complaint, and, those allegations are therefore denied.

184.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 184 of Plaintiffs' Complaint, and, those allegations are therefore denied.

185.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 185 of Plaintiffs' Complaint, and, those allegations are therefore denied.

186.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 186 of Plaintiffs' Complaint, and, those allegations are therefore denied.

**B. The Process of Enacting S.B. 189 Was Rushed and Flawed**

187.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 187 of Plaintiffs' Complaint, and, those allegations are therefore denied.

188.

The Spalding County Defendants have insufficient knowledge or information



sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 188 of Plaintiffs' Complaint, and, those allegations are therefore denied.

189.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 189 of Plaintiffs' Complaint, and, those allegations are therefore denied.

190.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 190 of Plaintiffs' Complaint, and, those allegations are therefore denied.

191.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 191 of Plaintiffs' Complaint, and, those allegations are therefore denied.

192.

The The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 192 of Plaintiffs' Complaint, and, those allegations are

therefore denied.

193.

The The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 193 of Plaintiffs' Complaint, and, those allegations are therefore denied.

194.

The Spalding County Defendants admit the allegations contained in Paragraph 194.

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

195.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 195 of Plaintiffs' Complaint, and, those allegations are therefore denied.

196.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 196 of Plaintiffs' Complaint, and, those allegations are therefore denied.

197.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 197 of Plaintiffs' Complaint, and, those allegations are therefore denied.

198.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 198 of Plaintiffs' Complaint, and, those allegations are therefore denied.

199.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 199 of Plaintiffs' Complaint, and, those allegations are therefore denied.

200.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 200 of Plaintiffs' Complaint, and, those allegations are therefore denied.

201.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 201 of Plaintiffs' Complaint, and, those allegations are therefore denied.

202.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 202 of Plaintiffs' Complaint, and, those allegations are therefore denied.

203.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 203 of Plaintiffs' Complaint, and, those allegations are therefore denied.

**D. SB 189's Changes to Georgia's Voter Challenge Provisions**

204.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 204 of Plaintiffs' Complaint, and, those allegations are therefore denied.

205.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 205 of Plaintiffs' Complaint, and, those allegations are therefore denied.

206.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 206 of Plaintiffs' Complaint, and, those allegations are therefore denied.

207.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 207 of Plaintiffs' Complaint, and, those allegations are therefore denied.

208.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 208 of Plaintiffs' Complaint, and, those allegations are therefore denied.

209.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 209 of Plaintiffs' Complaint, and, those allegations are therefore denied.

210.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 210 of Plaintiffs' Complaint, and, those allegations are therefore denied.

211.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 211 of Plaintiffs' Complaint, and, those allegations are therefore denied.

212.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 212 of Plaintiffs' Complaint, and, those allegations are therefore denied.

213.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 213 of Plaintiffs' Complaint, and, those allegations are therefore denied.

214.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 214 of Plaintiffs' Complaint, and, those allegations are therefore denied.

215.

The Spalding County Defendants can neither admit nor deny the allegations in

Paragraph 215 of Plaintiffs' Complaint, as those allegations contain statements or conclusions of law, but demand strict proof of them at trial.

216.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 216 of Plaintiffs' Complaint, and, those allegations are therefore denied.

217.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 217 of Plaintiffs' Complaint, and, those allegations are therefore denied.

218.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 218 of Plaintiffs' Complaint, and, those allegations are therefore denied.

219.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 219 of Plaintiffs' Complaint, and, those allegations are therefore denied.

220.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 220 of Plaintiffs' Complaint, and, those allegations are therefore denied.

221.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 221 of Plaintiffs' Complaint, and, those allegations are therefore denied.

**E. Voter Challenges Since Passage of S.B. 189**

222.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 222 of Plaintiffs' Complaint, and, those allegations are therefore denied.

223.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 223 of Plaintiffs' Complaint, and, those allegations are therefore denied.



224.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 224 of Plaintiffs' Complaint, and, those allegations are therefore denied.

225.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 225 of Plaintiffs' Complaint, and, those allegations are therefore denied.

226.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 226 of Plaintiffs' Complaint, and, those allegations are therefore denied.

227.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 227 of Plaintiffs' Complaint, and, those allegations are therefore denied.

228.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 228 of Plaintiffs' Complaint, and, those allegations are therefore denied.

228.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 228 of Plaintiffs' Complaint, and, those allegations are therefore denied.

229.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 229 of Plaintiffs' Complaint, and, those allegations are therefore denied.

230.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 230 of Plaintiffs' Complaint, and, those allegations are therefore denied.

231.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 231 of Plaintiffs' Complaint, and, those allegations are therefore denied.

232.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 232 of Plaintiffs' Complaint, and, those allegations are therefore denied.

233.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 233 of Plaintiffs' Complaint, and, those allegations are therefore denied.

234.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 234 of Plaintiffs' Complaint, and, those allegations are therefore denied.

235.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 235 of Plaintiffs' Complaint, and, those allegations are therefore denied.

236.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 236 of Plaintiffs' Complaint, and, those allegations are therefore denied.

237.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 237 of Plaintiffs' Complaint, and, those allegations are therefore denied.

238.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 238 of Plaintiffs' Complaint, and, those allegations are therefore denied.

239.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 239 of Plaintiffs' Complaint, and, those allegations are therefore denied.

240.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 240 of Plaintiffs' Complaint, and, those allegations are therefore denied.

241.

The Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained in Paragraph 241 of Plaintiffs' Complaint regarding allegations unnamed counties adjudication of burden of proof issues under O.C.G.A. § 21-2-230 and O.C.G.A. § 21-2-229, and, therefore, those allegations are denied. The Spalding County Defendants deny any allegation that they have failed to comply with either O.C.G.A. § 21-2-230 or O.C.G.A. § 21-2-229. Spalding County Defendants can neither admit nor deny the remaining allegations in Paragraph 241 of Plaintiffs' Complaint, and those allegations are therefore denied.

242.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 242 of Plaintiffs' Complaint, and, those allegations are therefore denied.

### **CAUSES OF ACTION**

243.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 243 of Plaintiffs' Complaint, and, those allegations are therefore denied.

244.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 844 of Plaintiffs' Complaint, and, those allegations are therefore denied.

245.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 245 of Plaintiffs' Complaint, and, those allegations are therefore denied.

246.

The Spalding County Defendants admit the allegations contained in Paragraph 246 of Plaintiffs' Complaint, so far as receipt of notice of violation from the Plaintiffs. However, any allegations, whether express or implied, that the Spalding County Defendants have violated any provision of Georgia or Federal law is expressly denied. As to the remaining allegations in Paragraph 246 of the Complaint, the Spalding County Defendants have insufficient knowledge to determine the truth or falsity of the allegations contained therein, and, therefore, those allegations are denied.

247.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 247 of Plaintiffs' Complaint, and, those allegations are therefore denied.

248.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 248 of Plaintiffs' Complaint, and, those allegations are therefore denied.

### **COUNT 1**

#### **The S.B. 189 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.

As to the allegations contained in Paragraph 249 of Plaintiff's Complaint, The

Spalding County Defendants realleges their responses to paragraphs 1 through 249 as if fully set forth herein.

250.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 250 of Plaintiffs' Complaint, and, those allegations are therefore denied.

251.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 251 of Plaintiffs' Complaint, and, those allegations are therefore denied.

252.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 252 of Plaintiffs' Complaint, and, those allegations are therefore denied.

253.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 253 of Plaintiffs' Complaint, and, those allegations are therefore denied.



254.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 254 of Plaintiffs' Complaint, and, those allegations are therefore denied.

255.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 255 of Plaintiffs' Complaint, and, those allegations are therefore denied.

256.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 256 of Plaintiffs' Complaint, and, those allegations are therefore denied.

257.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 257 of Plaintiffs' Complaint, and, those allegations are therefore denied.

258.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 258 of Plaintiffs' Complaint, and, those allegations are therefore denied.

259.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 259 of Plaintiffs' Complaint, and, those allegations are therefore denied.

260.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 260 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## **COUNT II**

### **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.

As to the allegations contained in Paragraph 261 of Plaintiff's Complaint, The Spalding County Defendants realleges their responses to paragraphs 1 through 260 as if fully set forth herein.

262.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 262 of Plaintiffs' Complaint, and, those allegations are therefore denied.

263.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 263 of Plaintiffs' Complaint, and, those allegations are therefore denied.

264.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 264 of Plaintiffs' Complaint, and, those allegations are therefore denied.

265.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 265 of Plaintiffs' Complaint, and, those allegations are therefore denied.

266.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 266 of Plaintiffs' Complaint, and, those allegations are therefore denied.

267.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 267 of Plaintiffs' Complaint, and, those allegations are therefore denied.

268.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 268 of Plaintiffs' Complaint, and, those allegations are therefore denied.

269.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 269 of Plaintiffs' Complaint, and, those allegations are therefore denied.

270.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 270 of Plaintiffs' Complaint, and, those allegations are therefore denied.

### **COUNT III**

#### **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.

As to the allegations contained in Paragraph 271 of Plaintiff's Complaint, The Spalding County Defendants realleges their responses to paragraphs 1 through 270 as if fully set forth herein.

272.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 272 of Plaintiffs' Complaint, and, those allegations are therefore denied.

273.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 273 of Plaintiffs' Complaint, and, those allegations are therefore denied.

274.

The Spalding County Defendants deny the allegations contained in Paragraph 274 of Plaintiffs' Complaint as they pertain to the Spalding County Defendants only. As to Paragraph 274's allegations pertaining to the remaining co-defendants, the Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 41 of Plaintiffs' Complaint, and, those allegations are therefore denied.

275.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 275 of Plaintiffs' Complaint, and, those allegations are therefore denied.

#### **COUNT IV**

#### **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.

As to the allegations contained in Paragraph 276 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 275 as if fully set forth herein.

277.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 277 of Plaintiffs' Complaint, and, those allegations are therefore denied.

278.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 278 of Plaintiffs' Complaint, and, those allegations are therefore denied.

279.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 279 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## COUNT V

### **SB 189 Section 4's Unhoused Voter Mailing Address Restriction Violates Multiple NVRA'S Notice Requirements**

52 U.S.C. §[sic] 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.

As to the allegations contained in Paragraph 280 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 279 as if fully set forth herein.

281.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 281 of Plaintiffs' Complaint, and, those allegations are therefore denied.

282.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 282 of Plaintiffs' Complaint, and, those allegations are therefore denied.



283.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 283 of Plaintiffs' Complaint, and, those allegations are therefore denied.

284.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 284 of Plaintiffs' Complaint, and, those allegations are therefore denied.

285.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 285 of Plaintiffs' Complaint, and, those allegations are therefore denied.

286.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 286 of Plaintiffs' Complaint, and, those allegations are therefore denied.

287.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 287 of Plaintiffs' Complaint, and, those allegations are therefore denied.

***CONSTITUTIONAL CLAIMS:***

**COUNT VI**

**S.B. 189 Section 5's "Nonresidential Address" Provisions Violate the Fundamental 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.

As to the allegations contained in Paragraph 288 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 287 as if fully set forth herein.

289.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 289 of Plaintiffs' Complaint, and, those allegations are therefore denied.

290.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 290 of Plaintiffs' Complaint, and, those allegations are therefore denied.

291.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 291 of Plaintiffs' Complaint, and, those allegations are therefore denied.

292.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 292 of Plaintiffs' Complaint, and, those allegations are therefore denied.

293.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 293 of Plaintiffs' Complaint, and, those allegations are therefore denied.

294.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 294 of Plaintiffs' Complaint, and, those allegations are therefore denied.

295.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 295 of Plaintiffs' Complaint, and, those allegations are therefore denied.

296.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 296 of Plaintiffs' Complaint, and, those allegations are therefore denied.

297.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 297 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## **COUNT VII**

### **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.

As to the allegations contained in Paragraph 298 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 297 as if fully set forth herein.

299.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 299 of Plaintiffs' Complaint, and, those allegations are therefore denied.

300.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 300 of Plaintiffs' Complaint, and, those allegations are therefore denied.

301.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 301 of Plaintiffs' Complaint, and, those allegations are therefore denied.

302.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 302 of Plaintiffs' Complaint, and, those allegations are therefore denied.

303.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 303 of Plaintiffs' Complaint, and, those allegations are therefore denied.

304.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 904 of Plaintiffs' Complaint, and, those allegations are therefore denied.

305.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 305 of Plaintiffs' Complaint, and, those allegations are therefore denied.

306.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 306 of Plaintiffs' Complaint, and, those allegations are therefore denied.

307.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 307 of Plaintiffs' Complaint, and, those allegations are therefore denied.

308.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 308 of Plaintiffs' Complaint, and, those allegations are therefore denied.

309.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 309 of Plaintiffs' Complaint, and, those allegations are therefore denied.

310.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 310 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## **COUNT VIII**

### **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.

As to the allegations contained in Paragraph 311 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 310 as if fully set forth herein.

312.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 312 of Plaintiffs' Complaint, and, those allegations are therefore denied.

313.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 313 of Plaintiffs' Complaint, and, those allegations are therefore denied.

314.

The Spalding County Defendants have insufficient knowledge or information



sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 314 of Plaintiffs' Complaint, and, those allegations are therefore denied.

315.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 315 of Plaintiffs' Complaint, and, those allegations are therefore denied.

316.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 316 of Plaintiffs' Complaint, and, those allegations are therefore denied.

317.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 317 of Plaintiffs' Complaint, and, those allegations are therefore denied.

318.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 318 of Plaintiffs' Complaint, and, those allegations are therefore denied.

319.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 319 of Plaintiffs' Complaint, and, those allegations are therefore denied.

320.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 320 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## COUNT IX

### **S.B. 189 Section 5's "Nonresidential" Address Provisions Violate Due Process**

*42 U.S.C. § 1983; Fourteenth Amendment 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.

As to the allegations contained in Paragraph 321 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 320 as if fully set forth herein.

322.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 322 of Plaintiffs' Complaint, and, those allegations are therefore denied.

323.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 323 of Plaintiffs' Complaint, and, those allegations are therefore denied.

324.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 324 of Plaintiffs' Complaint, and, those allegations are therefore denied.

325.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 325 of Plaintiffs' Complaint, and, those allegations are therefore denied.

326.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 326 of Plaintiffs' Complaint, and, those allegations are therefore denied.

327.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 327 of Plaintiffs' Complaint, and, those allegations are therefore denied.

328.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 328 of Plaintiffs' Complaint, and, those allegations are therefore denied.

329.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 329 of Plaintiffs' Complaint, and, those allegations are therefore denied.

330.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 330 of Plaintiffs' Complaint, and, those allegations are therefore denied.

331.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 331 of Plaintiffs' Complaint, and, those allegations are therefore denied.

332.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 332 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## COUNT X

### **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 DefendantClass Represented by the Gwinnett County Board of Registrations and Elections)

333.

As to the allegations contained in Paragraph 333 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 332 as if fully set forth herein.

334.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 334 of Plaintiffs' Complaint, and, those allegations are therefore denied.

335.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 335 of Plaintiffs' Complaint, and, those allegations are therefore denied.

336.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 336 of Plaintiffs' Complaint, and, those allegations are therefore denied.

337.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 337 of Plaintiffs' Complaint, and, those allegations are therefore denied.

338.

The Spalding County Defendants have insufficient knowledge or information

sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 338 of Plaintiffs' Complaint, and, those allegations are therefore denied.

339.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 339 of Plaintiffs' Complaint, and, those allegations are therefore denied.

340.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 340 of Plaintiffs' Complaint, and, those allegations are therefore denied.

341.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 341 of Plaintiffs' Complaint, and, those allegations are therefore denied.

342.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 342 of Plaintiffs' Complaint, and, those allegations are therefore denied.

343.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 343 of Plaintiffs' Complaint, and, those allegations are therefore denied.

344.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 344 of Plaintiffs' Complaint, and, those allegations are therefore denied.

345.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 345 of Plaintiffs' Complaint, and, those allegations are therefore denied.

346.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 346 of Plaintiffs' Complaint, and, those allegations are therefore denied.

347.

The Spalding County Defendants have insufficient knowledge or information



sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 347 of Plaintiffs' Complaint, and, those allegations are therefore denied.

348.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 348 of Plaintiffs' Complaint, and, those allegations are therefore denied.

349.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 349 of Plaintiffs' Complaint, and, those allegations are therefore denied.

## **COUNT XI**

### **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.

As to the allegations contained in Paragraph 350 of Plaintiff's Complaint, the

Spalding County Defendants realleges their responses to paragraphs 1 through 349 as if fully set forth herein.

351.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 351 of Plaintiffs' Complaint, and, those allegations are therefore denied.

352.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 352 of Plaintiffs' Complaint, and, those allegations are therefore denied.

353.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 353 of Plaintiffs' Complaint, and, those allegations are therefore denied.

354.

The Spalding County Defendants deny the allegations in Paragraph 354 of Plaintiffs' Complaint.

355.

The Spalding County Defendants deny the allegations in Paragraph 355 of Plaintiffs' Complaint.

356.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 356 of Plaintiffs' Complaint, and, those allegations are therefore denied.

357.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 357 of Plaintiffs' Complaint, and, those allegations are therefore denied.

358.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 358 of Plaintiffs' Complaint, and, those allegations are therefore denied.

359.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 359 of Plaintiffs' Complaint, and, those allegations are therefore denied.

***CIVIL RIGHTS ACT CLAIM:***

**COUNT XII**

**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.

As to the allegations contained in Paragraph 360 of Plaintiff's Complaint, the Spalding County Defendants realleges their responses to paragraphs 1 through 359 as if fully set forth herein.

361.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 361 of Plaintiffs' Complaint, and, those allegations are therefore denied.

362.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in

Paragraph 362 of Plaintiffs' Complaint, and, those allegations are therefore denied.

363.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 363 of Plaintiffs' Complaint, and, those allegations are therefore denied.

364.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 364 of Plaintiffs' Complaint, and, those allegations are therefore denied.

365.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 365 of Plaintiffs' Complaint, and, those allegations are therefore denied.

366.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 366 of Plaintiffs' Complaint, and, those allegations are therefore denied.

367.

The Spalding County Defendants deny the allegations contained in Paragraph 367.

368.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 367 of Plaintiffs' Complaint, and, those allegations are therefore denied.

369.

The Spalding County Defendants have insufficient knowledge or information sufficient to form a belief as to the truth or falsity of the allegations contained in Paragraph 369 of Plaintiffs' Complaint, and, those allegations are therefore denied.

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

(a).

Paragraph (a) contains requests for relief that require no response. To the extent a response is required from the Spalding County Defendants, the Spalding County Defendants deny that the requested relief is justified or appropriate, unless the Court finds the challenged provisions unconstitutional or otherwise in violation of Federal law.

(b).

Paragraph (b) contains a request for relief that requires no response. To the extent a response is required from the Spalding County Defendants, the Spalding County Defendants deny that the requested relief is justified or appropriate, unless the Court finds the challenged provisions unconstitutional or otherwise in violation of Federal law.

(c).

Paragraph (c) contains a request for relief that requires no response. To the extent a response is required from the Spalding County Defendants, the Spalding County Defendants deny that the requested relief is justified or appropriate, unless the Court finds the challenged provisions unconstitutional or otherwise in violation of Federal law.

(d)

Paragraph (d) contains a request for relief that requires no response. To the extent a response is required from the Spalding County Defendants, the Spalding County Defendants deny that the requested relief is justified or appropriate, unless the Court finds the challenged provisions unconstitutional or otherwise in violation of Federal law.

(e)

Paragraph (e) contains requests for relief that require no response. To the extent a response is required from the Spalding County Defendants, the Spalding County Defendants deny that the requested relief is justified or appropriate, unless the Court finds the challenged provisions unconstitutional or otherwise in violation of Federal law.

(f)

Paragraph (f), including numerals i through xvi, contains a request for relief that requires no response. To the extent a response is required from the Spalding County Defendants, the Spalding County Defendants deny that the requested relief is justified or appropriate, unless the Court finds the challenged provisions unconstitutional or otherwise in violation of Federal law.

(g)

Paragraph (g) contains a request for relief that requires no response.

(h)

Paragraph (h) contains a request for relief that requires no response.

(i)

Paragraph (i) contains a request for relief that requires no response.



WHEREFORE, having answered Plaintiffs' Complaint and stated defenses and objections, the Spalding County Defendants respectfully request that Plaintiffs' claims be dismissed. Plaintiffs' prayer for relief be denied in each and every particular with all costs taxed to the Plaintiffs, and the Spalding County Defendants be granted such other relief as this Court may deem just and proper.

This 17th day of January, 2025.

BECK, OWEN, & MURRAY  
Attorneys for the Spalding County  
Defendants

By: /s/ Karl P. Broder  
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**LOCAL RULE 5.1C CERTIFICATION**

By signature below, counsel certifies that the foregoing pleading was prepared in Times New Roman, 14-point font in compliance with Local Rule 5.1C.

This 17th day of January, 2025.

BECK, OWEN, & MURRAY  
Attorneys for the Spalding County  
Defendants

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**CERTIFICATE OF SERVICE**

I hereby certify that I have filed the foregoing using the CM/ECF system,  
which will send a notice of electronic filing to all counsel of record.

This 17th day of January, 2025.

BECK, OWEN, & MURRAY  
Attorneys for the Spalding County  
Defendants

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