

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

NEW GEORGIA PROJECT, et al.	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION FILE NO.:
v.	)	
	)	1:24-CV-03412-SDG
BRAD RAFFENSPERGER, in his	)	
official capacity as Secretary of	)	(Consolidated with
State of the State of Georgia, et al.	)	1:24-CV-04287-SDG and
	)	1:24-CV-04659-SDG)
Defendants.	)	

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**DEKALB DEFENDANTS' MOTION TO DISMISS PLAINTIFFS'  
CONSOLIDATED SECOND AMENDED COMPLAINT**

**NOW COME** the DEKALB COUNTY BOARD OF REGISTRATION AND ELECTIONS (the “**BRE**”); VASU ABHIRAMAN, in his official capacity as a member of the BRE (“**Abhiraman**”); NANCY JESTER, in her official capacity as a member of the BRE (“**Jester**”); ANTHONY LEWIS, in his official capacity as a member of the BRE (“**Lewis**”); SUSAN MOTTER, in her official capacity as a member of the BRE (“**Motter**”); and KARLI SWIFT, in her official capacity as a member of the BRE (“**Swift**,” together with BRE, Abhiraman, Jester, Lewis, and Motter, the “**DeKalb Defendants**”) and, pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6), file this Motion to Dismiss (the “**Motion**”) the second amended complaint [Doc. 276]. In support of the Motion, the DeKalb Defendants rely upon the Memorandum of Law in Support of DeKalb

Defendants' Motion to Dismiss Plaintiffs' Consolidated Second Amended Complaint filed contemporaneously herewith.

Respectfully submitted, this 14<sup>th</sup> day of May, 2025.

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