

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, \*

vs. \*

KAREN EVANS-DANIEL, ROBERT \*  
ABBOT, JOEL HAZARD, THOMAS \*  
ELLINGTON, and MIKE KAPLAN, \*  
in their official capacity as members of \*  
the Macon-Bibb County Board of \*  
Elections, *et al.*, \*

Defendants. \*

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

Plaintiffs, \*

vs. \*

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, *et al.*, \*

Defendants. \*

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

MACON-BIBB COUNTY DEFENDANTS' REPLY IN SUPPORT  
OF MOTION TO DISMISS PLAINTIFFS' CONSOLIDATED SECOND  
AMENDED COMPLAINT

In support of their motion to dismiss [Doc. 297], the Macon-Bibb County Board of Elections; Karen Evans-Daniel, Robert Abbott, Joel Hazard, Thomas Ellington, and Mike Kaplan, named in their official capacity as members of the Macon-Bibb County Board of Elections (hereinafter “Macon-Bibb Defendants”), adopt the arguments set forth in State Defendants’ Reply Brief in Support of Motion to Dismiss Plaintiffs’ Consolidated Second Amended Complaint [Doc. 305], except that the Macon-Bibb County Defendants do not adopt State Defendants’ arguments regarding traceability to and redressability by State Defendants in Sections I(D) and III(C) of their brief, nor do they adopt State Defendants’ lack of objection to the pre-suit notices in Section II(A) of their brief. The Macon-Bibb Defendants further do not adopt State Defendant’s arguments regarding whether certain provisions of S.B. 189 violate or do not violate the NVRA or the Constitution as set forth in Sections II(B-D) and III(A-B).

In keeping with the above-outlined decision not to adopt State Defendants’ lack of objection to the pre-suit notices in Section II(A) of the State Defendants’ reply brief, the Macon-Bibb Defendants instead adopt the arguments set forth in Columbia County Defendants’ Reply Brief in Support

of their Motion to Dismiss Plaintiffs' Second Amended Complaint [Doc. 309] as if fully restated herein.

For all the reasons set forth herein, Plaintiffs' Consolidated Second Amended Complaint should be dismissed.

Respectfully submitted this 28<sup>th</sup> day of May, 2025.

/s/ Grace Simms Martin

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing has been prepared in accordance with the font type and margin requirements set forth in Local Rule 5.1, using Century Schoolbook font and 13-point type.

This 28<sup>th</sup> day of May, 2025.

/s/ Grace Simms Martin

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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 28<sup>th</sup> day of May, 2025.

/s/ Grace Simms Martin

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