

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

NEW GEORGIA PROJECT, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State of
the State of Georgia, *et al.*

Defendants.

Civil Action No. 1:24-cv-03412-SDG

**FORSYTH COUNTY DEFENDANTS’ REPLY IN SUPPORT OF THEIR
MOTION TO DISMISS PLAINTIFFS’ CONSOLIDATED SECOND
AMENDED COMPLAINT**

In support of their Motion to Dismiss Plaintiffs’ Consolidated Second Amended Complaint (“Forsyth County MTD”) [Doc. 285], Defendants Barbara Luth, Joel Natt, Carla Radzikinas, Anita Tucker, and Debbie Stair¹, in their official capacities as members of the Forsyth County Board of Voter Registrations and Elections (“FCBRE”) (collectively, “Forsyth County Defendants”), adopt the arguments set forth in State Defendants’ Reply Brief in Support of its Motion to Dismiss Plaintiffs’ Consolidated Second Amended Complaint (“State Defendants’

¹ Debbie Stair was sworn in on March 4, 2025 as a new member of the Forsyth County Board of Voter Registration and Elections, replacing former member Dan Thalimer.

Reply Brief”) [Doc. 305] *except* that Forsyth County Defendants do not adopt State Defendants’ arguments regarding traceability to and redressability by State Defendants in Section I(D) of their Reply Brief.

Furthermore, in both Count I and Count III of the Consolidated Second Amended Complaint [Doc. 276], Plaintiffs assert alleged violations of the National Voter Registration Act of 1993 (“NVRA”). However, Count III is solely against certain county defendants, including Forsyth County. Therefore, the same arguments that State Defendants make regarding Count I, as addressed in Section II(B) of State Defendants’ Reply Brief, also apply to Count III. Therefore, Forsyth County Defendants adopt the arguments set forth in Section II(B) of State Defendants’ Reply Brief in support of their request to dismiss Count III.

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

Respectfully submitted this 28th day of May 2025.

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

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CERTIFICATE OF SERVICE

I hereby certify that on May 28, 2025, I electronically filed the foregoing FORSYTH COUNTY DEFENDANTS' REPLY IN SUPPORT OF MOTION TO DISMISS PLAINTIFFS' CONSOLIDATED SECOND AMENDED COMPLAINT with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

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