

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

A. PHILIP RANDOLPH INSTITUTE,  
et al,

Plaintiffs,

v.

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

Defendants.

CIVIL ACTION

NO. 1:24-CV-03412-SDG

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GEORGIA STATE CONFERENCE OF  
THE NAACP, et al,

Plaintiffs,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

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SECURE FAMILIES INITIATIVE  
AND THEIR MEMBERS,

Plaintiff,

v.

BRAD RAFFENSPERGER, et al.,

Defendants.

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**MOTION TO ENTER DECLARATORY JUDGMENT AS TO  
COUNTS CHALLENGING SECTION 4**

In this consolidated litigation, which arose as three separate cases, six voting rights organization bring various challenges to Sections 4 and 5 of Georgia Senate Bill 189 (2024) (“S.B. 189”).<sup>1</sup> Section 4 provides that the

mailing address for election purposes of any person of this state who is homeless and without a permanent address shall be the registrar’s office of the county in which such person resides[.]

O.C.G.A. § 21-2-217(a)(1.1).

Various Plaintiffs challenge Section 4 on several grounds, in Counts IV, V, and VIII of the Second Amended Complaint. ECF No. 276. On December 3, 2025, the Court held a hearing on various Defendants’ motions to dismiss, and on a motion for certification of a defendant class filed by some of the Plaintiff groups, Dkt. No. 319.

In pleadings and at the hearing, challenges to Section 4 have rested on the same core argument advanced by those Plaintiffs: Requiring homeless individuals to receive election-related mail at their county registrar’s office, even as other voters are free to receive mail at an address of their own choosing, is unlawful. However, Defendants have represented that Section 4 “does not apply to homeless individuals

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<sup>1</sup> Plaintiffs Secure Families Initiative (SFI) and Georgia Muslim Voter Project (GMVP) do not challenge Section 4 of S.B. 189 in this litigation and, therefore, do not seek relief in this Motion. SFI and GMVP do not, however, oppose the Motion.

who have an address where they can receive mail.” State Defs.’ Reply Br. in Supp. of Mot. to Dismiss, Dkt. No. 305 at 28; *see also id.* at 27, 30. Essentially, then, Section 4 designates the county registrar’s office as an option of last resort, only for homeless voters who do not have an address where they can receive mail.

Considering Defendants’ repeated acknowledgements, Plaintiffs respectfully move the Court to enter the attached order for declaratory judgment as to all Section 4 claims.

Respectfully submitted this 17th day of March, 2026,

/s/Cory Isaacson

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**CERTIFICATE OF COMPLIANCE**

I certify that the foregoing has been prepared in 14-point Times New Roman, a font and type selection approved by the Court in Local Rule 5.1.

This 17th day of March, 2026.

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**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send notification of filing to all attorneys of record.

This 17th day of March, 2026.

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