

IN THE SUPERIOR COURT OF DEKALB COUNTY  
STATE OF GEORGIA

WILLIAM HENDERSON and DEKALB  
COUNTY REPUBLICAN PARTY,

Plaintiffs,

v.

VASU ABHIRAMAN, NANCY JESTER,  
ANTHONY LEWIS, SUSAN MOTTER, and  
KARLI SWIFT,

Defendants,

GEORGIA STATE CONFERENCE OF THE  
NAACP, NEW GEORGIA PROJECT,  
GEORGIA COALITION FOR THE  
PEOPLE'S AGENDA, INC., A. PHILLIP  
RANDOLPH INSTITUTE, COMMON  
CAUSE GEORGIA, and LEAGUE OF  
WOMEN VOTERS OF GEORGIA,

Proposed Intervenors.

CIVIL ACTION FILE NO. 24CV8564

**MOTION BY GEORGIA STATE CONFERENCE OF THE NAACP, NEW GEORGIA  
PROJECT, GEORGIA COALITION FOR THE PEOPLE'S AGENDA, INC., A. PHILLIP  
RANDOLPH INSTITUTE, COMMON CAUSE GEORGIA, AND LEAGUE OF WOMEN  
VOTERS OF GEORGIA TO INTERVENE AS DEFENDANTS**

Proposed Intervenors Georgia State Conference of the NAACP, New Georgia Project, Georgia Coalition for the People's Agenda, Inc., A. Phillip Randolph Institute, Common Cause Georgia, and League of Women Voters of Georgia (the "Proposed Intervenors") move to participate as intervening defendants. For the reasons discussed in the Memorandum of Law in support of this Motion, attached as Exhibit 1, Proposed Intervenors are entitled to intervene in this case as a matter of right under O.C.G.A § 9-11-24(a)(2). In the alternative, Proposed Intervenors request permissive intervention under O.C.G.A § 9-11-24(b)(2). Proposed Intervenors have filed

a Proposed Order granting the Motion to Intervene as Exhibit 2. Under O.C.G.A. § 9-11-24(c), Proposed Intervenor have filed a Proposed Motion to Dismiss the Application for Writ of Mandamus, attached as Exhibit 3. Should the Court deny the Motion to Dismiss, Proposed Intervenor have attached a Proposed Answer as Exhibit 4. Declarations in support of the Motion to Intervene on behalf of the Proposed Intervenor Organizations are attached as Exhibits 5-10.

Respectfully submitted this 2nd day of October, 2024:

/s/ Gerald Weber

Gerald Weber (Ga. Bar No. 744878)

**LAW OFFICES OF GERRY WEBER,  
LLC**

P.O. Box 5391

Atlanta, Georgia 31107

(404) 522-0507

wgerryweber@gmail.com

Ezra D. Rosenberg\*

Julie M. Houk\*

Pooja Chaudhuri\*

Alexander S. Davis\*

Heather Szilagyi\*

**LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW**

1500 K Street NW, Suite 900

Washington, D.C. 20005

(202) 662-8600

erosenberg@lawyerscommittee.org

jhouk@lawyerscommittee.org

pchaudhuri@lawyerscommittee.org

adavis@lawyerscommittee.org

hszilagyi@lawyerscommittee.org

**On behalf of the:** Georgia State Conference  
of the NAACP and Georgia Coalition for the  
People's Agenda, Inc.

John Powers\*

Hani Mirza\*

**ADVANCEMENT PROJECT**  
1220 L Street Northwest, Suite 850  
Washington, D.C. 20005  
(202) 728-9557  
jpowers@advancementproject.org  
hmirza@advancementproject.org

**On behalf of the:** New Georgia Project and  
A. Phillip Randolph Institute.

John A. Freedman\*  
**ARNOLD & PORTER**  
**KAYE SCHOLER LLP**  
601 Massachusetts Ave. N.W.  
Washington, DC 20001  
(202) 942 5000  
john.freedman@arnoldporter.com

**On Behalf of the:** Georgia State Conference  
of the NAACP, New Georgia Project,  
Georgia Coalition for the People's Agenda,  
Inc, and the A. Phillip Randolph Institute.

John S. Cusick\*  
Stuart Naifeh\*  
Morenike Fajana\*  
Allison Scharfstein\*  
**NAACP LEGAL DEFENSE**  
**& EDUCATIONAL FUND, INC.**  
40 Rector Street, 5th Floor  
New York, NY 10006  
jcusick@naacpldf.org  
snaifeh@naacpldf.org  
mfajana@naacpldf.org  
ascharfstein@naacpldf.org

R. Gary Spencer (Ga. Bar No. 671905)  
**NAACP LEGAL DEFENSE**  
**& EDUCATIONAL FUND, INC.**  
260 Peachtree St. NW, Ste 2300  
Atlanta, GA 30303  
gspencer@naacpldf.org

**On behalf of the:** Georgia State Conference  
of the NAACP and Georgia Coalition for the  
People's Agenda, Inc.