

IN THE SUPERIOR COURT OF OCONEE COUNTY  
STATE OF GEORGIA

  
Angela Elder-Johnson, Clerk  
Oconee County, Georgia

SUZANNAH HEIMEL )  
 )  
Plaintiff, )  
 )  
v. ) CASE NO. SUSR024000058-LL  
 )  
SHARON GREGG, Director of the Oconee )  
County Board of Elections, and )  
JAY HANLEY, Chair of the Oconee )  
County Board of Elections )

**ANSWER OF SHARON GREGG AND JAY HANLEY**

Defendants Sharon Gregg, Director of the Oconee County Board of Elections, and Jay Hanley, Chair of the Oconee County Board of Elections (collectively, "Defendants") hereby answer Plaintiff's Petition for Writ of Mandamus as follows:

FIRST DEFENSE

Plaintiff does not have a clear legal right to the relief sought.

SECOND DEFENSE

Plaintiff fails to state a claim for which relief may be granted.

THIRD DEFENSE

The relief Plaintiff seeks is barred by federal and state law.

FOURTH DEFENSE

Defendants have faithfully performed their legal duties.

FIFTH DEFENSE

Plaintiff lacks standing.

## SIXTH DEFENSE

Defendants specifically reserve the right to seek leave to amend and/or supplement their answer to assert any affirmative defense, response, or other matter that may arise or become relevant during the course of proceedings.

Defendants specifically respond to the individually numbered paragraphs of Plaintiffs' Petition for Writ of Mandamus as follows:

1.

Defendants admit that they continue to register new applicants for voter registration who are eligible to vote in Oconee County as required by state and federal law. Defendants admit that they received correspondence purporting to challenge certain peoples continuing eligibility to vote on July 19, 2024. Defendants admit that they did not hold hearings on each of those purported challenges, but deny that they violated any law. Any other allegations not specifically admitted herein are denied.

2.

Denied.

3.

Denied.

4.

Defendants admit that they received correspondence on July 19, 2024 purporting to challenge certain peoples continuing eligibility to vote. Defendants admit that they dismissed all of the challenges but two, and held a hearing for the two challenges they did not dismiss on August 15, 2024. Defendants lack sufficient information to admit or deny Plaintiff's characterizations of

her actions and therefore deny the same. Defendants deny that they violated the election code or any other official duties. Any other allegations not specifically admitted herein are denied.

5.

Denied.

6, 7, 8

Denied that Plaintiffs are entitled to the requested relief or any relief whatsoever.

Respectfully submitted this 7<sup>th</sup> day of October, 2024.

*s/ C. Ryan Germany*

C. Ryan Germany

Ga. Bar No. 500691

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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I, Amber M. Carter, do hereby certify that we have this day served a true and correct copy of the foregoing **Answer of Sharon Gregg and Jay Hanley** via statutory electronic service using the Odyssey eFileGA filing system, causing it to be served on all counsel of record.

This 7<sup>th</sup> day of October, 2024.

*/s/ Amber M. Carter*

Amber M. Carter

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