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OCT 08, 2024 05:32 PM

  
Angela Elder-Johnson, Clerk  
Oconee County, Georgia

IN THE SUPERIOR COURT OF OCONEE COUNTY  
STATE OF GEORGIA

SUZANNAH HEIMEL,

Plaintiff,

v.

SHARON GREGG and JAY HANLEY,

Defendants,

SUSAN NOAKES and COMMON CAUSE  
GEORGIA,

Intervenor-Defendants.

CIVIL CASE NO.  
SUSR2024000058-LL

**EMERGENCY MOTION TO EXPEDITE**

Intervenor-Defendant Susan Noakes respectfully requests expedited treatment of her cross-claim filed October 4, 2024. Dkt. 18.

Election Day is less than one month away, early voting begins next week, and the relief requested would impact the status of eligible voters going into the voting period. Intervenor-Defendant Noakes requests resolution of the status of dozens of voters placed on “challenged status” pursuant to O.C.G.A. § 21-2-230. Clarity on the status of these voters is preferable before they show up to vote in the General Election or request an absentee ballot. Doing otherwise risks serious fundamental harm to each of these voters and to the community as a whole. Resolving these issues prior to Election Day on November 5, 2024, will lower the risk of disenfranchisement, ease the burden of election administration on local officials, and serve the public interest.

Superior Court judges have wide discretion to set hearings on any schedule that they deem necessary, including even setting an “immediate hearing.” Unif. Super. Ct. Rule 6. In the initial appearance in this case, counsel for Defendants stated that he did not oppose expedited treatment.

Plaintiff<sup>1</sup> and Defendants were each given the opportunity to object to the specific hearing date of October 21, 2024, and both agreed to this date.

For these reasons, Intervenor-Defendant Noakes requests expedited treatment and resolution of the above-styled case. A proposed Rule Nisi order is attached for the Court's convenience.

Respectfully submitted this 8th day of October, 2024

/s/ Jeremy Burnette

Jeremy Burnette (Ga. Bar No. 142467)  
Anthony W. Morris (Ga. Bar No. 523495)  
**AKERMAN LLP**  
999 Peachtree Street NE  
Suite 1700  
Atlanta, Georgia 30309  
(404) 733-9800  
[jeremy.burnette@akerman.com](mailto:jeremy.burnette@akerman.com)  
[anthony.morris@akerman.com](mailto:anthony.morris@akerman.com)

/s/ Courtney O'Donnell

Bradley E. Heard (Ga. Bar 342209)  
Courtney O'Donnell (Ga. Bar 164720)  
Pichaya Poy Winichakul (Ga. Bar 246858)  
**SOUTHERN POVERTY LAW CENTER**  
150 E Ponce de Leon Ave, Suite 340  
Decatur, GA 30030  
(404) 521-6700  
[bradley.heard@splcenter.org](mailto:bradley.heard@splcenter.org)  
[courtney.odonnell@splcenter.org](mailto:courtney.odonnell@splcenter.org)  
[poy.winichakul@splcenter.org](mailto:poy.winichakul@splcenter.org)

/s/ Avner Shapiro

Avner Shapiro\*  
**SOUTHERN POVERTY LAW CENTER**  
1101 17th Street NW, Suite 510  
Washington, DC 20036  
(240) 890-1735  
[avner.shapiro@splcenter.org](mailto:avner.shapiro@splcenter.org)

*Counsel for Susan Noakes, Common Cause Georgia*

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<sup>1</sup> The Court dismissed Plaintiff's initial pleadings at the October 7, 2024 Hearing. Nevertheless, she stated that she was available on October 21 and did not object to expedited treatment of the crossclaim.

/s/ Cory Isaacson

Cory Isaacson (Ga. Bar No. 983797)

Caitlin May (Ga. Bar No. 602081)

Akiva Freidlin (Ga. Bar No. 692290)

**ACLU FOUNDATION OF GEORGIA, INC.**

P.O. Box 570738

Atlanta, Georgia 30357

(678)310-3699

[cisaacson@acluga.org](mailto:cisaacson@acluga.org)

[cmay@acluga.org](mailto:cmay@acluga.org)

[afreidlin@acluga.org](mailto:afreidlin@acluga.org)

/s/ Sophia Lin Lakin

Sophia Lin Lakin\*

Theresa J. Lee\*

Jonathan Topaz\*

Sara Worth\*

**AMERICAN CIVIL LIBERTIES  
FOUNDATION**

125 Broad St, 18th Floor

New York, NY 10004

(212) 549-2500

[slakin@aclu.org](mailto:slakin@aclu.org)

[tlee@aclu.org](mailto:tlee@aclu.org)

[jtopaz@aclu.org](mailto:jtopaz@aclu.org)

[vrp\\_sw@aclu.org](mailto:vrp_sw@aclu.org)

*Counsel for Susan Noakes*

\*motion for admission *pro hac vice* forthcoming

**IN THE SUPERIOR COURT OF OCONEE COUNTY  
STATE OF GEORGIA**

SUZANNAH HEIMEL, )

Plaintiff, )

v. )

SHARON GREGG - DIRECTOR OF )  
BOARD OF ELECTIONS and JAY )  
HANLEY - CHAIRMAN OF BOARD OF )  
ELECTIONS, )

Defendant, )

SUSAN NOAKES and COMMON CAUSE )  
GEORGIA, )

Proposed Intervenors. )

CASE NO.  
SUSR024000058-LL

**CERTIFICATE OF SERVICE**

I hereby certify that, on October 8, 2024, the foregoing was served upon the following persons by electronic mail and to all parties and counsel on record through the Court's electronic service delivery to:

Suzannah Heimel  
[heimels@yahoo.com](mailto:heimels@yahoo.com)  
1340 Twin Oaks Trail  
Watkinsville GA 30677

Sharon Gregg  
[sgregg@oconee.ga.us](mailto:sgregg@oconee.ga.us)  
7635 Macon Highway  
Suite 200  
Watkinsville, GA 30677

Jay Hanley  
[jhanley@oconee.ga.us](mailto:jhanley@oconee.ga.us)  
7635 Macon Highway  
Suite 200  
Watkinsville, GA 30677

/s/ Jeremy Burnette  
Jeremy Burnette (Ga. Bar No. 142467)