

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA STATE CONFERENCE OF
THE NAACP; GEORGIA COALITION
FOR THE PEOPLE'S AGENDA, INC.; and
NEW GEORGIA PROJECT, INC.,

Plaintiffs,

v.

Case No: 1:24-cv-04546-ELR

BRIAN KEMP, Governor of the State of
Georgia, in his official capacity, and BRAD
RAFFENSPERGER, Secretary of State of
Georgia, in his official capacity,

Defendants,

REPUBLICAN NATIONAL COMMITTEE
and GEORGIA REPUBLICAN PARTY,
INC.

Intervenor-Defendants.

**ANSWER BY THE REPUBLICAN NATIONAL COMMITTEE
AND GEORGIA REPUBLICAN PARTY**

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**pro hac vice forthcoming*

Intervenors—the Republican National Committee and the Georgia Republican Party, Inc.—answer the Plaintiffs’ complaint. Unless expressly admitted below, every allegation in the complaint is denied. Accordingly, Intervenors state:

INTRODUCTION

1. Intervenors deny that relief is necessary to prevent “widespread disenfranchisement.” This paragraph otherwise consists of legal arguments to which no response is required.

2. Intervenors admit that Hurricane Helene made landfall in Georgia on September 27, 2024, and caused substantial damage. The news article speaks for itself, and Intervenors otherwise lack sufficient information to admit or deny the other allegations made in the paragraph.

3. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

4. Intervenors admit that Hurricane Helene caused damage and disruption in Georgia. Intervenors otherwise lack sufficient information to admit or deny the other allegations made in the paragraph.

5. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

6. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

7. Intervenors deny that Defendants' actions risk "disenfranchising eligible voters across Georgia." This paragraph otherwise consists of legal arguments to which no response is required.

8. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

9. Deny.

PARTIES

10. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

11. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

12. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

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24. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

25. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

26. Defendants admit that Brian Kemp is the Governor of Georgia. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

27. Defendants admit that Brad Raffensperger is the Georgia Secretary of State. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

JURISDICTION AND VENUE

28. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

29. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

30. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

31. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

32. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

STATEMENT OF FACTS AND LAW

33. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

34. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

35. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

36. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

37. Intervenors admit that the Governor declared a state of emergency. The executive order otherwise speaks for itself.

38. Intervenors admit that Hurricane Helene made landfall in Georgia on September 27, 2024. The news article speaks for itself, and Intervenors otherwise lack sufficient information to admit or deny the other allegations made in the paragraph.

39. Intervenors admit that Hurricane Helene caused substantial destruction in Georgia.

40. Intervenors admit that the Georgia Supreme Court issued a judicial emergency order. The order otherwise speaks for itself.

41. Intervenors admit that the Governor extended the state of emergency. The executive order otherwise speaks for itself.

42. The cited authorities speak for themselves. Intervenors otherwise lack sufficient information to admit or deny the other allegations made in the paragraph.

43. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

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71. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

72. Intervenors lack sufficient information to admit or deny the other allegations made in the paragraph.

73. Intervenors deny that that Defendants' actions "will disenfranchise a significant number of eligible prospective voters." Intervenors otherwise lack sufficient information to admit or deny the other allegations made in the paragraph.

FIRST CLAIM FOR RELIEF

74. Intervenors incorporate their prior responses.

75. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

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80. This paragraph consists of legal arguments to which no response is required.

81. This paragraph consists of legal arguments to which no response is required.

82. Intervenors deny that Plaintiffs are entitled to their requested relief.

83. Intervenors deny that Plaintiffs are entitled to their requested relief.

SECOND CLAIM FOR RELIEF

84. Intervenors incorporate their prior responses.

85. The cited authorities speak for themselves. This paragraph otherwise consists of legal arguments to which no response is required.

86. This paragraph consists of legal arguments to which no response is required.

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92. Intervenors deny that Plaintiffs are entitled to their requested relief. This paragraph otherwise consists of legal arguments to which no response is required.

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PRAYER FOR RELIEF

Intervenors deny that Plaintiffs are entitled to their requested relief.

AFFIRMATIVE DEFENSES

1. The allegations in the complaint fail to state a claim.
2. Plaintiffs lack standing to bring this case.
3. The Court lacks subject-matter jurisdiction over this case.
4. Plaintiffs' requested relief is barred by the *Purcell* principle.

Dated: October 10, 2024

Respectfully submitted,

/s/ William Bradley Carver, Sr.

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*Counsel for Intervenor-Defendants
The Republican National Committee and Georgia Republican Party, Inc.*

CERTIFICATE OF COMPLIANCE

This document complies with Local Rule 5.1(B) because it uses 13 point Century Schoolbook font.

/s/ William Bradley Carver Sr.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on October 10, 2024, the foregoing was electronically filed with the Clerk of Court by using the CM/ECF system, which will also send a notice of electronic filing to all counsel of record. Those parties who have not yet appeared will be served via email.

/s/ William Bradley Carver Sr.