

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

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

BRAD RAFFENSPERGER, in his official
capacity as Secretary of State for the
State of Georgia,

Defendant.

Civil Action No. 1:26-cv-00485-ELR

**DEFENDANT RAFFENSPERGER'S MOTION TO DISMISS
PLAINTIFF'S COMPLAINT AND REQUEST FOR HEARING**

Defendant Secretary of State Brad Raffensperger moves to dismiss Plaintiff's Complaint, (Doc. 1), in its entirety pursuant to Fed. R. Civ. P. 12(b)(6). In support of this motion, the Secretary relies on his Brief in Support of Motion to Dismiss Plaintiffs' Complaint and the attached exhibits, which are filed with this motion.

Given the weighty issues public policy issues involved in this litigation, the Secretary also requests the Court set an in-person hearing on this motion as soon as possible. Despite the Secretary providing the entire voter list and supporting documentation regarding list maintenance almost two months ago, the DOJ continues to insist that more is required, despite no federal court yet agreeing with its position in similar litigation. This matter should be resolved quickly to ensure

that Georgia and federal laws related to the privacy of voter information are upheld.

Respectfully submitted this 5th day of February, 2026.

/s/ Bryan P. Tyson

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing brief was prepared in Book Antiqua 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson
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