

Exhibit 1

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHÉ ALEXANDER, Clerk of Courts
for Fulton County,

Defendant.

Case No. 1:25-CV-07084-TWT

**BLACK VOTERS MATTER FUND, CWA LOCAL 3204, AND CWA
LOCAL 3204 RETIRED MEMBERS COUNCIL'S [PROPOSED] MOTION
TO DISMISS**

Proposed Intervenors Black Voters Matter Fund, CWA Local 3204, and CWA Local 3204 Retired Members Council respectfully move to dismiss Plaintiff's Complaint under Fed. R. Civ. P. 12(b)(6). For the reasons discussed in the supporting Memorandum filed alongside this Motion, Plaintiff's Complaint fails to state a claim upon which relief may be granted.

WHEREFORE, Proposed Intervenors request that the Court dismiss Plaintiff's Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6).

Dated: January 5, 2026

/s/ Uzoma N. Nkwonta

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CWA Local 3204 Retired Members Council

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