

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

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

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

*Defendant.*

Case No. 1:26-cv-00485-ELR

**NOTICE OF SUPPLEMENTAL AUTHORITY BY INTERVENORS  
BLACK VOTERS MATTER FUND, CWA LOCAL 3204, AND CWA  
LOCAL 3204 RETIRED MEMBERS COUNCIL**

Intervenors Black Voters Matter Fund, Communication Workers of America Local 3204, and Communication Workers of America Local 3204 Retired Members Council respectfully provide the Court notice of supplemental authority supporting Intervenors' pending Motion to Dismiss. *See* ECF No. 23. Today, in DOJ's parallel suit seeking Massachusetts's unredacted voter list, the district court dismissed DOJ's complaint on the ground that it failed to state any basis for its demand as required by Title III of the Civil Rights Act of 1960. *See* Order, *United States v. Galvin*, No. 1:25-cv-13816-LTS (D. Mass. Apr. 9, 2026), ECF No. 92 (attached hereto as Exhibit A). The court held Title III requires DOJ to state the "factual basis" for its demand, *id.* at 6, and rejected DOJ's argument that it could satisfy that requirement by stating

the *purpose* of its demand or by claiming the “basis for the demand was Title III of the CRA,” *id.* at 10. This decision supports Intervenors’ argument that DOJ’s failure to state any factual basis for its demand for Georgia’s voter list requires its claim to be dismissed. *See* Mem. in Supp. of Mot. to Dismiss at 10–15, ECF No. 23-1.

Dated: April 9, 2026

/s/ Uzoma N. Nkwonta

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*CWA Local 3204 Retired Members Council*

\*Appearing *pro hac vice*

**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1D, NDGa, the undersigned counsel hereby certifies that the foregoing document complies with the font and point selections approved by the Court in Local Rule 5.1C, NDGa. This document was prepared on a computer using Times New Roman font (14 point).

This 9th day of April, 2026.

/s/ Uzoma N. Nkwonta  
Uzoma N. Nkwonta

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