

IN THE SUPERIOR COURT OF PAULDING COUNTY  
STATE OF GEORGIA

  
Sheila Butler, Clerk  
Paulding County, Georgia

THE NEW GEORGIA PROJECT,

Plaintiff,

v.

PEGGY WILLIS, in her official capacity as Chair of the Paulding County Board of Elections and Voter Registration; BILL MCFADDEN, in his official capacity as Vice Chair of the Paulding County Board of Elections and Voter Registration; BOBBIE LEE, in her official capacity as a Member of the Paulding County Board of Elections and Voter Registration; ERNEST MORSE, in his official capacity as a Member of the Paulding County Board of Elections and Voter Registration; RAYMOND PHILLIPS, in his official capacity as a Member of the Paulding County Board of Elections and Voter Registration,

Defendants.

Civil Action No.

EMERGENCY RELIEF REQUESTED

**PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER**

Pursuant to O.C.G.A. § 9-11-65, O.C.G.A. § 9-6-20, and O.C.G.A. § 21-2-385, Plaintiff The New Georgia Project ("NGP") hereby moves this Court for an emergency temporary restraining order and writ of mandamus, with an accompanying memorandum of points and authorities filed contemporaneously and a proposed order granting the relief requested herein. Plaintiff requests that the Court consider this Emergency Motion on an expedited basis. This Emergency Motion asks the Court to order Defendants to make certain additional dates available for advance voting as required by Georgia law. The dates in question are quickly approaching.

Providing full statutorily-defined advance voting access is crucial to NGP's mission and will ensure that more Georgia voters are enfranchised.

Defendants' failure to comply with the Georgia Election Code limits the ability of Plaintiff's members to cast their vote in the runoff election. If Plaintiff's request is not approved before December 19, 2020—and, indeed, as soon as possible so that the availability of advance voting on that date can be adequately publicized—many voters, including Plaintiff's members and constituents, will be disenfranchised.

WHEREFORE, Plaintiff requests that this Court issue an order requiring Defendants to allow advance voting access on (a) Saturday, December 19, 2020 from 9:00 a.m. to 4:00 p.m.; and (b) during regular business hours on January 4, 2021; and permit any voters seeking to cast their ballots on those dates to vote in compliance with O.C.G.A. § 21-2-385.

Respectfully submitted on this 15th day of December 2020.

**KREVOLIN AND HORST, LLC**

*/s/ Adam M. Sparks*

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*\*Pro hac vice admission pending*