

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

NEW GEORGIA PROJECT, SANG *
HUYNH, GEORGIA MUSLIM VOTER*
PROJECT, and A. PHILLIP *
RANDOLPH INSTITUTE, *

CIVIL ACTION FILE NO.
1:24-cv-03412-SDG

Plaintiffs, *

vs. *

KAREN EVANS-DANIEL, ROBERT *
ABBOT, JOEL HAZARD, THOMAS *
ELLINGTON, and MIKE KAPLAN, *
in their official capacity as members of *
the Macon-Bibb County Board of *
Elections, *et al.*, *

Defendants. *

GEORGIA STATE CONFERENCE *
OF THE NAACP, GEORGIA *
COALITION FOR THE PEOPLE'S *
AGENDA, INC., AND VOTERIDERS *

Plaintiffs, *

vs. *

MACON-BIBB COUNTY BOARD *
OF ELECTIONS; KAREN *
EVANS-DANIEL, ROBERT *
ABBOTT, JOEL HAZARD, THOMAS *
ELLINGTON, and MIKE KAPLAN, *
in their official capacity as members of *
the Macon-Bibb County Board of *
Elections, *et al.*, *

Defendants. *

MACON-BIBB COUNTY DEFENDANTS' MOTION TO DISMISS
PLAINTIFFS' CONSOLIDATED FIRST AMENDED COMPLAINT

COME NOW MACON-BIBB COUNTY BOARD OF ELECTIONS;
KAREN EVANS-DANIEL, ROBERT ABBOTT, JOEL HAZARD, THOMAS
ELLINGTON, AND MIKE KAPLAN, Members of the Macon-Bibb County
Board of Elections, in their official capacities (hereinafter "Macon-Bibb
Defendants"), and move to dismiss Plaintiffs' Consolidated First Amended
Complaint [Doc. 155] in its entirety pursuant to Fed. R. Civ. P. 12(b)(1) and (6)
because Plaintiffs lack standing and fail to state a claim upon which relief may
be granted.

In support of this motion, the Macon-Bibb Defendants hereby adopt the
arguments set forth in State Defendants' Brief in Support of Motion to Dismiss
[Doc. 168-1], except that the Macon-Bibb Defendants do not adopt State
Defendants' arguments regarding traceability to and redressability by State
Defendants set forth in Sections II(D-E) of their brief, and they do not adopt
State Defendants' arguments regarding whether certain provisions of S.B. 189
violate the NVRA or the Constitution as set forth in Sections IV(B-D), V, and
VI of their brief.

For all other reasons set forth in State Defendant's Motion to Dismiss
which were adopted herein, this Court should dismiss Plaintiffs' claims.

Respectfully submitted this 17th day of January, 2025.

/s/ Grace Simms Martin _____

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing has been prepared in accordance with the font type and margin requirements set forth in Local Rule 5.1, using Century Schoolbook font and 13-point type.

This 17th day of January, 2025.

/s/ Grace Simms Martin

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CERTIFICATE OF SERVICE

I hereby certify that I have filed the foregoing using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

This 17th day of January, 2025.

/s/ Grace Simms Martin _____

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