

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' REPLY IN SUPPORT
OF MOTION TO DISMISS PLAINTIFFS' CONSOLIDATED FIRST
AMENDED COMPLAINT

In support of their motion to dismiss [Doc. 173], Defendants Karen Evans-Daniel, Robert Abbott, Joel Hazard, Thomas Ellington, and Mike Kaplan, named in their official capacity as members of the Macon-Bibb County Board of Elections (hereinafter “Macon-Bibb Defendants”), adopt the arguments set forth in State Defendants’ Reply Brief in Support of Motion to Dismiss Plaintiffs’ Consolidated First Amended Complaint [Doc. 238], except that the Macon-Bibb County Defendants do not adopt State Defendants’ arguments regarding traceability to and redressability by State Defendants in Section I(E) of their brief, and do not adopt State Defendants’ arguments regarding whether certain provisions of S.B. 189 violate or do not violate the NVRA or the Constitution as set forth in Sections II(B-D), III(A-B), IV(B).

For all the reasons set forth herein, Plaintiffs’ Consolidated First Amended Complaint should be dismissed.

Respectfully submitted this 7th day of March, 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 7th day of March, 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 7th day of March, 2025.

/s/ Grace Simms Martin _____

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