

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

GEORGIA STATE CONFERENCE OF THE
NAACP; GEORGIA COALITION FOR THE
PEOPLE’S AGENDA, INC.; and NEW
GEORGIA PROJECT, INC.,

Case _____

Plaintiffs,

v.

BRIAN KEMP, Governor of the State of
Georgia, in his official capacity, and BRAD
RAFFENSPERGER, Secretary of State of
Georgia, in his official capacity,

Defendants.

**PLAINTIFFS’ EMERGENCY MOTION FOR A TEMPORARY
RESTRAINING ORDER**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Georgia State Conference of the NAACP, Georgia Coalition for the People’s Agenda, Inc., and New Georgia Project, Inc. (“Plaintiffs”) respectfully move the Court on an emergency basis for a temporary restraining order (“TRO”) requiring Defendants Georgia Governor Brian Kemp and Secretary of State Brad Raffensperger to:

1. discontinue enforcement of the current voter registration deadline for the State of Georgia, and

2. extend the voter registration deadline for the State of Georgia by all methods, including online, in-person, and mail registration, up to and including October 14, 2024; or, in the alternative,
3. discontinue enforcement of the current voter registration deadline, and extend the voter registration deadline by all methods, including online, in-person, and mail registration, for all counties that have experienced widespread or prolonged power outages, internet outages, postal service disruptions, or office closures, including those listed in Plaintiffs' Complaint, and any other county that experienced similar disruptions, up to and including October 14, 2024.

The basis for this motion is fully set forth in Plaintiffs' Memorandum of Law in Support of Emergency Motion for a Temporary Restraining Order. Pursuant to Local Rule 7.2(B), this Memorandum sets forth in detail the necessity of an expedited procedure to resolve this matter on an emergency basis.

Respectfully submitted, this 7th day of October 2024.

R. Gary Spencer (Ga. Bar No. 671905)
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
260 Peachtree St. NW, Ste 2300
Atlanta, GA 30303
Telephone: (202) 216-5578
Fax: (202) 682-1312
gspencer@naacpldf.org

Brenda Wright*
Stuart Naifeh*
Amir Badat*
John S. Cusick*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, New York 10006
Telephone: (212) 965-2200
Facsimile: (212) 226-7592
bwright@naacpldf.org
snaifeh@naacpldf.org
abadat@naacpldf.org
jcusick@naacpldf.org

DeMetris Causer (Ga. Bar No. 347916)
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
700 14th St. NW
Washington, D.C. 20005
Telephone: (646) 906-1344
Fax: (202) 682-1312
dcauser@naacpldf.org

Attorneys on behalf of: Georgia State
Conference of the NAACP and
Georgia Coalition for the People's
Agenda, Inc.

/s/ Cory Isaacson

Cory Isaacson (Ga. Bar No. 983797)
Caitlin May (Ga. Bar No. 602081)
Akiva Freidlin (Ga. Bar No. 692290)
ACLU FOUNDATION OF GEORGIA INC.
P.O. Box 570738
Atlanta, GA 30357
(678) 310-3699
cisaacson@acluga.org
cmay@acluga.org
afreidlin@acluga.org

Theresa J. Lee*
Sophia Lin Lakin*
Sara Worth*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, NY 10004
(212) 549-2500
tlee@aclu.org
slakin@aclu.org
sw_vrp@aclu.org

Ezra D. Rosenberg*
Julie M. Houk*
Heather Szilagyi*
Grace Thomas*
erosenberg@lawyerscommittee.org
jhouk@lawyerscommittee.org
hszilagyi@lawyerscommitte.org
gthomas@lawyerscommittee.org
Lawyers' Committee for Civil Rights Under
Law 1500 K Street NW, Suite 900
Washington, D.C. 20005
Telephone: (202) 662-8600
Facsimile: (202) 783-0857

Kristen A. Johnson*
COOLEY LLP
55 Hudson Yards
New York, NY 10001-2157
Telephone: (212) 479-6695
Facsimile: (212) 479-6275
kjohnson@cooley.com

Maureen Alger*
COOLEY LLP
3175 Hanover Street
Palo Alto, CA 94304-1130
Telephone: (650) 843-5000
Facsimile: (650) 849-7400
malger@cooley.com

Attorneys on behalf of: Georgia State
Conference of the NAACP and Georgia
Coalition for the People's Agenda, Inc., and
New Georgia Project

** Motion for Admission Pro Hac Vice
Forthcoming*