

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

LUCILLE ANDERSON, SARA  
ALAMI, GIANELLA CONTRERAS  
CHAVEZ, DSCC, and DEMOCRATIC  
PARTY OF GEORGIA, INC.,

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, in his  
official capacity as the Georgia  
Secretary of State and Chair of the  
Georgia State Election Board, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:20-CV-03263-MLB

**COUNTY DEFENDANTS' MOTION TO DISMISS**

County Defendants<sup>1</sup> jointly move to dismiss Plaintiffs' Complaint for Injunctive and Declaratory Relief [Doc. 1] in its entirety pursuant to Fed. R. Civ. P. 12(b)(1) and (6). Further, Clayton Defendants assert, and hereby preserve, their defenses of insufficient service of process and lack of personal jurisdiction. In support of this motion, County Defendants rely on their Brief

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<sup>1</sup> County Defendants are the members of the Boards of Election for Chatham, Clayton, Cobb, DeKalb, Douglas, Fulton, Gwinnett, Henry, and Macon-Bibb Counties, as listed on pages 3-4 of Plaintiffs' Complaint [Doc. 1], and as further amended by the Court's Order substituting a Henry County Board of Elections and Registration Official-Capacity Defendant [Doc. 90].

in Support of County Defendants' Motion to Dismiss, which is filed with this motion.

Respectfully submitted this 8th day of September, 2020.

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**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing COUNTY DEFENDANTS' MOTION TO DISMISS has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson  
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