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

BLACK VOTERS MATTER FUND, and MEGAN GORDON, on behalf of herself and all others similarly situated,	
Plaintiffs,	Civil Action No. 1:20-cv-1489-AT
vs.	
BRAD RAFFENSPERGER, in his official capacity as Secretary of State of Georgia; DEKALB COUNTY BOARD OF REGISTRATION & ELECTIONS, and all others similarly situated,	
Defendants.	

PLAINTIFF BLACK VOTERS MATTER FUND'S RESPONSE TO COURT'S INQUIRY

Pursuant to this Court's request during the April 24, 2020 hearing for a

statement from Plaintiff Black Voters Matter Fund concerning its role in stamp

distribution, see Doc. 75 at 113:24-115:5, Plaintiffs attach a Supplemental

Declaration of Cliff Albright, labeled as Exhibit O.

Paragraphs 37-39, as well as 14-17, 25-26 and 43-44, appear to most directly

address this Court's question about the specific role that Plaintiff plays in stamp

distribution. However, out of an abundance of caution, Plaintiff Black Voters

Matter Fund believes it should include other facts that place direct stamp distribution is placed in proper context in terms of how Plaintiffs have diverted, and would divert, their resources this year on other initiatives in response to the postage requirement. These other initiatives include adding layers of voter education that informs voters about how to obtain postage themselves, which is just as important as direct stamp distribution.

Respectfully submitted this 28th day of April, 2020.

Sean Young

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Attorneys for Plaintiffs

CERTIFICATE OF COMPLIANCE

Pursuant to N.D. Ga. Local Civil Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with N.D. Ga. Local Civil Rule 5.1(C) in Times New Roman 14-point typeface.

Sean Young

Attorney Bar Number: 790399 Attorney for Plaintiffs AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF GEORGIA, INC. P.O. Box 77208 Atlanta, GA 30357 Telephone: (678) 981-5295 Email: syoung@acluga.org

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

Sean Young

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