

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

THE NEW GEORGIA PROJECT,  
*et al.*,

*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-01986-ELR

**COUNTY DEFENDANTS'<sup>1</sup> CONSOLIDATED MOTION TO DISMISS**

County Defendants jointly move to dismiss Plaintiffs' First Amended Complaint for Injunctive and Declaratory Relief [Doc. 33] in its entirety pursuant to Fed. R. Civ. P. 12(b)(1) and (6). Further, Bibb, Chatham, Athens-Clarke, Albany-Dougherty, Muscogee, and Richmond County Defendants move to dismiss the Complaint against them pursuant to Fed. R. Civ. P. 12(b)(3). In support of this motion, County Defendants rely on their Brief in

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<sup>1</sup> County Defendants include a list of all party Defendants as an appendix to the attached brief.

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

Respectfully submitted this 26th day of June, 2020.

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**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing COUNTY DEFENDANTS' CONSOLIDATED 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  
Bryan P. Tyson