

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

S.P.S., *ex rel.* SHORT, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:19-CV-04960-AT

**DEFENDANTS BRAD RAFFENSPERGER, DAVID WORLEY,  
REBECCA SULLIVAN, ANH LE, AND SETH HARP'S MOTION TO  
DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT**

Defendants Secretary of State Brad Raffensperger and State Election Board Members David J. Worley, Rebecca N. Sullivan, Anh Le, and Seth Harp (the "Defendants") move to dismiss Plaintiffs' claims in their entirety pursuant to Fed. R. Civ. P. 12(b)(1) and (6). In support of this motion, Defendants rely on their Brief in Support of Motion to Dismiss Plaintiffs' First Amended Complaint, which is filed with this motion.

Respectfully submitted this 10th day of January, 2020.

Christopher M. Carr  
Attorney General  
Georgia Bar No. 112505  
Annette M. Cowart  
Deputy Attorney General

Georgia Bar No. 191199  
Russell D. Willard  
Senior Assistant Attorney General  
Georgia Bar No. 760280  
Charlene S. McGowan  
Assistant Attorney General  
Georgia Bar No. 697316  
Office of the Georgia Attorney General  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334

/s/ Bryan P. Tyson  
Bryan P. Tyson  
Special Assistant Attorney General  
Georgia Bar No. 515411  
btyson@taylorenghish.com  
Bryan F. Jacoutot  
Georgia Bar No. 668272  
bjacoutot@taylorenghish.com  
Diane Festin LaRoss  
Georgia Bar No. 430830  
dlaross@taylorenghish.com  
TAYLOR ENGLISH DUMA LLP  
1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
Telephone: (678)336-7249

*Counsel for Defendants*

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing DEFENDANTS BRAD RAFFENSPERGER, DAVID WORLEY, REBECCA SULLIVAN, ANH LE, AND SETH HARP'S MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT 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