

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

Rebecca Brooks, *et al.*,)
)
Plaintiffs,)
)
v.)
)
Thomas Mahoney III, in his official)
capacity as Chairman of the Chatham)
County Board of Elections, *et al.*,)
)
Defendants.)
)
_____)

Case No. 4:20-cv-00281-RSB-CLR

AMENDMENT TO VERIFIED COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF

COME NOW PLAINTIFFS REBECCA BROOKS, STUART ABEL, III, JAMES MARTIN, III, and NICOLE MARTIN (“Plaintiffs”), by and through their undersigned counsel of record, and files this their Amendment to Verified Complaint for Declaratory and Injunctive Relief solely for the purposes of amending Plaintiffs’ Certificate of Service thereto.

Respectfully submitted this 12th day of November, 2020.

SMITH & LISS, LLC

/s/ Ray S. Smith, III
Georgia Bar No. 662555
Local Counsel for Plaintiffs

Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328
(404) 760-6000
rsmith@smithliss.com

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2020, I caused the Amendment to Verified Complaint for Declaratory and Injunctive Relief in the above-captioned matter to be filed with the United States District Court for the Southern District of Georgia, Savannah Division, via the Court's CM/ECF system. I also hereby certify that I caused the Amendment to Verified Complaint for Declaratory and Injunctive Relief and the Verified Complaint for Declaratory and Injunctive Relief and all exhibits and attachments thereto in the above-captioned matter, filed in the above-captioned matter on November 11, 2020, to be served via FedEx and email, with the appropriate Waiver of the Service of Summons forms, upon the following:

Chatham County, GA Board of Elections

Chatham County Board of Elections
1117 Eisenhower Dr., Ste. F
Savannah, GA 31406

Thomas Mahoney III, Chairman, tmahoney@tmahoneylaw.com;
Marianne Heimes, Board Member, mjheimes@aol.com;
Malinda Hodge, Board Member, hodgemalinda@aol.com;
Debbie Rauers, Board Member, drauers@aol.com;
Antwan Lang, Board Member
County Attorney: R. Jonathan Hart, Rjhart@chathamcounty.org
(Board of Elections did not have Mr. Antwan Lang's email on file; County Attorney R. Jonathan Hart was served via email)

DeKalb County Board of Registrations and Elections

DeKalb County Government Offices
1300 Commerce Dr.
Decatur, GA 30030

Anthony Lewis, Board Member, antlewis@dekalbcountyga.gov;
Susan Motter, Board Member, smotter@dekalbcountyga.gov;
Dele Lowman Smith, Board Member, dlsmith@dekalbcountyga.gov;
Samuel E. Tillman, Board Chair, setillman@dekalbcountyga.gov;
Becky Vu, Board Member, baokyvu@dekalbcountyga.gov;
County Attorney: Viviane H. Ernstes, vernstes@dekalbcountyga.gov

Fulton County Registration and Elections Board

Fulton County Government Address:

141 Pryor St. SW
Atlanta, GA 30303

Mary Carole Cooney, Chairperson, mccooney@mindspring.com;
Vernetta Keith Nuriddin, Vice Chair, vernettanuriddin@live.com
Kathleen Ruth, Member, drkayruth@icloud.com;
Aaron Johnson, Member, aaronvjohnson@yahoo.com;
Mark Wingate, [Member wingate01md@gmail.com](mailto:Memberwingate01md@gmail.com);
County Attorney: Patrise M. Perkins-Hooker patrise.perkins-hooker@fultoncountyga.gov

Clayton County, GA Board of Elections and Registration

Elections and Registration
Jonesboro Historical Courthouse - Main Floor
121 S. McDonough St.
Jonesboro, GA 30236

Carol Wesley, [Chair ccwesley7@gmail.com](mailto:Chairccwesley7@gmail.com);
Dorothy Foster Hall, Vice Chair, hallfosterd@hotmail.com;
Patricia Pullar, Member, pat.pullar@gmail.com;
Darlene Johnson, Member, ddgirl533@gmail.com;
Diane Givens, Secretary, dianegivens3@gmail.com;
County Attorney: Charles Reed, charles.reed@claytoncountyga.gov

Gwinnett County, GA Board of Registrations and Elections

Gwinnett Justice & Administration Center
75 Langley Dr.
Lawrenceville, GA 30046

John Mangano, Chairman, john.mangano@gwinnettcounty.com;
Ben Satterfield, Vice Chairman, ben.satterfield@gwinnettcounty.com;
Wandy Taylor, Member, wandy.taylor@gwinnettcounty.com;
Stephen W. Day, Member, stephen.day@gwinnettcounty.com;
[Alice O'Lenick](mailto:AliceO'Lenick@gwinnettcounty.com), Member, alice.olenick@gwinnettcounty.com;
County Attorney: Mike Ludwiczak, mike.ludwiczak@gwinnettcounty.com

Cobb County, GA Board of Elections and Registration

736 Whitlock Ave. NW, Ste. 400
Marietta, GA 30064

Attorneys for the Cobb Board:

Greg Litchfield, gel@hlcwlaw.com

Dan White, dwhite@hlcwlaw.com

Richmond County, GA Board of Elections

Richmond County Board of Elections

535 Telfair St., Ste. 500

Augusta, GA 30901

Tim McFalls, Chairperson

Sherry T. Barnes, Vice Chair

Marcia Brown, Secretary

Terence Dicks, Board Member

Bob Finnegan, Board Member

Individual Board Member email addresses not published; all filings sent to the Richmond County Attorney, Wayne Brown [at: wbrown@augustaga.gov](mailto:wbrown@augustaga.gov)

Henry County, GA Board of Elections and Registration

Henry County Administration Building

140 Henry Pkwy.

McDonough, GA 30253

Donna Morris-McBride, Chair, dmcbride@co.henry.ga.us;

Andy Callaway, Co-Chair, ccallaway@co.henry.ga.us;

Arch Brown, Board Member, archbrown@co.henry.ga.us;

Mildred Schmelz, Board Member, mschmelz@co.henry.ga.us;

County Attorney: Patrick Jaugstetter (Jarrard & Davis, L.L.P.), patrickj@jarrard-davis.com

Secretary of State Brad Raffensperger – brad@sos.ga.gov and soscontact@sos.ga.gov

214 State Capitol

Atlanta, Georgia 30334

Governor Brian Kemp – brian.kemp@georgia.gov

206 Washington St., Ste. 203

State Capitol

Atlanta, GA 30334

Attorney General Chris Carr – ccarr@georgia.org and ccarr@law.ga.gov

40 Capitol Square, SW

Atlanta, GA 30334

[signature on following page]

This 12th day of November, 2020.

SMITH & LISS, LLC

/s/ Ray S. Smith, III
Georgia Bar No. 662555
Local Counsel for Plaintiffs

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Suite 2600
Atlanta, Georgia 30328
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