

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

CORECO JA'QAN PEARSON, VIKKI  
TOWNSEND CONSIGLIO, GLORIA  
KAY GODWIN, JAMES KENNETH  
CARROLL, CAROLYN HALL FISHER,  
CATHLEEN ALSTON LATHAM and  
BRIAN JAY VAN GUNDY,

Plaintiffs,

v.

BRIAN KEMP, in his official capacity as  
Governor of Georgia, BRAD  
RAFFENSPERGER, in his official  
capacity as Secretary of State and Chair of  
the Georgia State Election Board, DAVID  
J. WORLEY, in his official capacity as a  
member of the Georgia State Election  
Board, REBECCA N. SULLIVAN, in her  
official capacity as a member of the  
Georgia State Election Board, MATTHEW  
MASHBURN, in his official capacity as a  
member of the Georgia State Election  
Board, and ANH LE, in her official  
capacity as a member of the Georgia State  
Election Board,

Defendants.

CIVIL ACTION FILE NO.  
1:20-cv-04809-TCB

**MOTION TO DISMISS**

COME NOW THE DEMOCRATIC PARTY OF GEORGIA, INC., the DSCC, and the DCCC (collectively, the “Democratic Political Party Committees”), by and through their attorneys, and file this Proposed Motion to Dismiss pursuant to the Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

The basis for the motion is more fully set forth in the Democratic Political Party Committees’ accompanying Brief in Support of Proposed Motion to Dismiss.

Dated: November 30, 2020.

Respectfully submitted,

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Defendants*

*\*Pro Hac Vice Application Pending*

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KENNETH CARROLL, CAROLYN  
HALL FISHER, CATHLEEN ALSTON  
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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of L.R. 5.1, using font type of Times New Roman and a point size of 14.

Dated: November 30, 2020.

**Adam M. Sparks**  
*Counsel for Proposed Intervenor-  
Defendants*