

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

CORECO JA'QAN PEARSON, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION NO.
v.	)	1:20-cv-4809-TCB
	)	
BRIAN KEMP, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**STATE DEFENDANTS' MOTION TO DISMISS**

Defendants Governor Brian Kemp, Secretary of State Brad Raffensperger, and State Election Board members Rebecca N. Sullivan, David J. Worley, Matthew Mashburn, and Ahn Le (collectively, "State Defendants") hereby move to dismiss Plaintiffs' Complaint for pursuant to FED. R. CIV. P. 12(b)(1) and (6) for lack of subject matter jurisdiction and various other threshold defenses stated in the accompanying brief in support. The State Defendants also move that the Court deny any injunctive, declaratory relief, and other relief sought in the Plaintiffs' Complaint. State Defendants respectfully request that the Court grant their motion and dismiss the action with prejudice. A brief in support of this motion is being filed simultaneously.

Respectfully submitted, this 5th day of December, 2020.

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**CERTIFICATE OF COMPLIANCE**

I hereby certify that the foregoing has been formatted using Times New Roman font in 14-point type in compliance with Local Rule 7.1(D).

/s/ Charlene S. McGowan  
Charlene S. McGowan  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the foregoing **STATE DEFENDANTS' MOTION TO DISMISS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for all parties of record via electronic notification.

Dated: December 5, 2020.

/s/ Charlene S. McGowan  
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Assistant Attorney General