

IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA

John Wood,

Contestant,

v.

Brad Raffensperger, in his official capacity of  
Secretary of State of the State of Georgia; and Brian  
Kemp, in his official capacity as Governor of the  
State of Georgia.

Defendants.

Civ. Act. No. 2020CV342959

**Motion to Intervene as Defendants**

Gloria Butler, Bobby Fuse, Deborah Gonzalez, Stephen Henson, Van Johnson, Pedro Marin, Fenika Miller, Ben Myers, Rachel Paule, Calvin Smyre, Robert Trammell Jr., Manoj S. “Sachin” Varghese, Nikema Williams, and Cathy Woolard (collectively, the “Biden Electors”) seek to participate as intervening defendants to defend their interests in protecting their established victory, the rights of Georgia voters who cast ballots in the November 3, 2020 general election, and the integrity of the election process.

For the reasons discussed in the memorandum in support, filed concurrently herewith as Exhibit A, the Biden Electors are entitled to intervene in this case as a matter of right under O.C.G.A. § 9-11-24(a). In the alternative, the Biden Electors request permissive intervention pursuant to O.C.G.A. § 9-11-24(b). In accordance with O.C.G.A. § 9-11-24(c), the Biden Elector’s Proposed Answer to the Petition is attached as Exhibit B. The Biden Electors also submit a Proposed Order granting their Motion to Intervene attached as Exhibit C. The Biden Electors also submit their Proposed Motion to Dismiss Contestant’s Petition, attached as Exhibit D, with a

supporting memorandum of law, attached as Exhibit E. Biden Electors also submit the Attorney's Affidavit of Adam M. Sparks in support of their Motion to Intervene attached as Exhibit F.

WHEREFORE, the Biden Electors respectfully request that the Court grant them leave to intervene in the above-captioned matter.

Dated: November 30, 2020.

Respectfully submitted,

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**Memorandum in Support of Motion to Intervene**

**I. INTRODUCTION**

Pursuant to O.C.G.A. §§ 9-11-24, 21-2-520, and 21-2-524, Proposed Intervenors Gloria Butler, Bobby Fuse, Deborah Gonzalez, Stephen Henson, Van Johnson, Pedro Marin, Fenika Miller, Ben Myers, Rachel Paule, Calvin Smyre, Robert Trammell Jr., Manoj S. “Sachin” Varghese, Nikema Williams, and Cathy Woolard, move to intervene as Defendants in this action. Each of the proposed Intervenor-Defendants are among the slate of 16 presidential electors nominated by the Democratic Party and certified by Governor Brian Kemp after Secretary of State Brad Raffensperger certified the election results to formally declare President-Elect Joseph R. Biden, Jr., the winner of Georgia’s presidential race (collectively the “Biden Electors”). They are now empowered to and intend to cast Georgia’s electoral college votes for Biden.

On November 3, 2020, and as subsequently confirmed by a hand recount of every presidential vote, President-Elect Biden won the popular vote in Georgia. As a result, the Biden Electors were duly appointed to the Electoral College. On Wednesday, November 25, Contestant John Wood, an individual voter, filed this extraordinary election contest in an attempt to undo

those election results. Contestant's Petition is riddled with fatal procedural defects and supported by nothing more than rank speculation, implausible conspiracy theories, unsubstantiated statistical extrapolation, and flawed legal claims. It is political theatre, part of a broader and deeply troubling attempt playing out on a national stage to enlist the judiciary to cast doubt on the outcome of the presidential election.

The relief that Contestant seeks is as unprecedented and unjustifiable as his extraordinary claims. He seeks nothing less than the disenfranchisement of millions of lawful Georgia voters by way of a judicial declaration that would (1) render the results of Georgia's presidential election "null and void," and (2) permit the General Assembly to subvert democracy by appointing a new slate of presidential electors entirely untethered to the will of Georgia's voters. In the alternative, Contestant asks that the Court order a "second Presidential election" that would ensure Georgia's presidential electors cannot be certified by the federal safe harbor deadline in 3 U.S.C. § 5 (December 8) or the required date for the meeting of the electoral college, *id.* § 6 (December 14). *See* Petition for Election Contest ("Pet."), Prayer for Relief. In essence, Contestant requests that the election be set aside because his preferred candidate did not obtain support from a majority of the state's voters. There is no authority for this extraordinary request, which would not only upend Georgia's entire electoral process, but would effectively convert the state's political structure into something unfathomable to generations of Americans.

The Biden Electors—who are the proper defendants if this contest moves forward—should be permitted to intervene to protect their own interests, the interests of the candidate they are pledged to support, and the interests of the millions of Georgians who voted for that candidate.

## II. STATEMENT OF FACTS

On November 3, 2020, Georgia voters and the nation as a whole chose former Vice President and now President-Elect Biden as the United States' next President. The state's certified vote count confirms that President-Elect Biden defeated Donald J. Trump by 12,670 votes in the state of Georgia.<sup>1</sup> As a result, the Biden Electors were certified by the Governor and appointed to the Electoral College. Ex. 1; *see* O.C.G.A. § 21-2-10 (“At the November election to be held in the year 1964 and every fourth year thereafter, there shall be elected by the electors of this state persons to be known as electors of President and Vice President of the United States . . . .”); *see also* O.C.G.A. § 21-2-379.5(e) (“When presidential electors are to be elected, the ballot shall not list the individual names of the candidates for presidential electors but shall list the names of each political party and body and the names of the political party or body candidates for the office of President and Vice President.”); O.C.G.A. § 21-2-285(e) (same).

On November 11, following unsubstantiated complaints from Republican leaders about the integrity of the election, the Secretary announced that a statewide hand recount of the presidential election would take place.<sup>2</sup> *See* Exs. 2, 3. The hand recount began on November 12, and it concluded without issue on November 18. No significant irregularities in the original counts or the recount were reported. On November 20, the Secretary of State certified the results of the election, confirming the Biden Electors' victory and certifying that the “consolidated returns for state and

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<sup>1</sup> Kate Brumback, *Georgia officials certify election results showing Biden win*, AP (Nov. 20, 2020), <https://apnews.com/article/georgia-certify-election-joe-biden-ea8f867d740f3d7d42d0a55c1aef9e69>.

<sup>2</sup> Tal Axelrod, *Georgia secretary of state announces hand recount of presidential race*, The Hill (Nov. 11, 2020), <https://thehill.com/homenews/campaign/525476-georgia-secretary-of-state-announces-hand-recount>.

federal offices are a true and correct tabulation of the certified returns received by this office from each county.”<sup>3</sup> The Governor then issued final certificates of ascertainment declaring that the Biden Electors “were appointed Electors of President and Vice President of the United States for the State of Georgia . . . .” Ex. 1.

The next day—despite a comprehensive hand recount of every single ballot having just occurred—President Trump’s reelection campaign issued a “Recount Demand” to the Secretary, “pursuant to O.C.G.A. § 21-2-495(c) and State Board Rule 183-1-15.03,” in which it sought a second recount of the presidential election results, this time to be conducted by machine (the “machine recount”). Ex. 4. The machine recount, which utilizes ballot scanners, will be the *third* time votes are counted in the presidential race. It is already underway and must be completed by December 2.<sup>4</sup>

Contestant filed this action on November 25, seeking to invalidate the election of the Biden Electors and replace them with a slate chosen by the General Assembly, or to require a second presidential election. In support of his unprecedented request, Contestant offers: a conspiracy theory that a 501(c)(3) organization’s grants to assist localities conduct safe elections is actually a “‘shadow government’ operation” through which a social media CEO allegedly dictated the outcome of the election, Pet. at 4; an unsupported “estimated number of illegal votes counted,”

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<sup>3</sup> Michelle Ye Hee Lee, *Georgia certifies election results — the first to do so among states where Trump is mounting legal challenges*, Wash. Post (Nov. 20, 2020), [https://www.washingtonpost.com/politics/georgia-certifies-election-results--the-first-to-do-so-among-states-where-trump-is-mounting-legal-challenges/2020/11/20/66c77530-2b4b-11eb-9b14-ad872157ebc9\\_story.html](https://www.washingtonpost.com/politics/georgia-certifies-election-results--the-first-to-do-so-among-states-where-trump-is-mounting-legal-challenges/2020/11/20/66c77530-2b4b-11eb-9b14-ad872157ebc9_story.html).

<sup>4</sup> Kate Brumback, *Georgia counties set to start recount requested by Trump*, AP (Nov. 23, 2020), <https://apnews.com/article/election-2020-joe-biden-donald-trump-georgia-state-elections-352e729f14a243b98fdefda94ff164ce>.

based only on “statistical extrapolation,” *id.* at 3, ¶ 70; and conclusory, baseless allegations that election officials failed to follow state and federal law. *See generally id.* The factual allegations and legal theories in this contest are largely parallel those in unsuccessful federal court lawsuit brought by *Contestant* before the election; the Northern District of Georgia denied *Contestant*’s desired injunctive relief because he was unlikely to succeed on the merits of any claims and only alleged speculative injuries. *See* Order, ECF No. 18, *Georgia Voter Alliance v. Fulton Cnty*, No. 1:20-CV-4198-LMM (N.D. Ga. Oct. 28, 2020).

Despite widespread acknowledgement that no fraud occurred, various coordinated lawsuits, much like this one, have been filed around the country and in Georgia in an attempt to sow confusion and cast doubt on the legitimacy of the election.<sup>5</sup> Indeed, a lawsuit alleging similar improprieties and conspiracy theories was filed more than two weeks ago in the Northern District of Georgia. After considering the parties’ briefing and argument in a comprehensive two-hour argument, the court denied plaintiff’s motion for a temporary restraining order. *See* Opinion and Order, *Wood v. Raffensperger*, No. 20-cv-04651, 2020 WL 6817513 at \*12 (N.D. Ga. Nov. 20, 2020) (denying Plaintiff’s claim for emergency injunctive relief in part because Plaintiff “cannot show a likelihood of success on the merits”). That plaintiff also sought to prevent the certification of the Biden Electors victory, which the Court called an “extraordinary remedy . . . [that] would breed confusion, undermine the public’s trust in the election, and potentially disenfranchise of over one million Georgia voters.” *Id.* That court explained that “interfer[ing] with the result of an

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<sup>5</sup> *See, e.g.,* Nick Corasaniti, et al., *The Times Called Officials in Every State: No Evidence of Voter Fraud*, N.Y. Times (Nov. 10, 2020), <https://www.nytimes.com/2020/11/10/us/politics/voting-fraud.html>.



election that has already concluded would be unprecedented and harm the public in countless ways.” *Id.*

### **III. ARGUMENT**

Georgia courts permit winning candidates to intervene in election contests challenging their victory. *See, e.g., Williams v. Heard*, 302 Ga. 114, 115 (2017) (“[T]he court allowed [the winning candidate] to intervene in the contest action.”). The Biden Electors have an undeniable interest in this lawsuit, which seeks to declare their victory null and void. Not only is Contestant’s request wholly unwarranted (not least of all because it comes upon the heels of the state’s thorough hand recount of all ballots and in the midst of a *second* recount), but the Biden Electors have particular interests in showing that Contestant’s allegations are utterly specious and cannot justify the extraordinary relief he seeks.

#### **A. The Biden Electors have a statutory right to intervene.**

Georgia law permits intervention as a matter of right “[w]hen a statute confers an unconditional right to intervene . . . .” O.C.G.A. § 9-11-24(a)(1). Here, the election contest statutes provide the statutory basis for intervention. They clearly state that, in an election contest, the “defendant” means “[t]he person whose . . . election is contested.” O.C.G.A. § 21-2-520(2)(A). The statutes also require the contestant allege “[t]he name of the defendant” and “[t]he name of each person who was a candidate at such . . . election for such . . . office,” each of whom is served by the court clerk. O.C.G.A. § 21-2-524(a)(3)(4), (f). Those defendants and candidates “shall be deemed [] litigant[s] to such proceeding and may set up by way of answer or cross action any right of interest or claim he or she may have.” O.C.G.A. § 21-2-524(f).

Presidential candidates are not elected by the voters of Georgia; rather, Georgia’s electorate selects presidential electors who then vote for presidential candidates on behalf of the state at the

Electoral College. Georgia’s Election Code states, “[a]t the November election to be held in the year 1964 and every fourth year thereafter, there shall be elected by the electors of this state persons to be known as *electors of President and Vice President* of the United States . . . .” O.C.G.A. § 21-2-10 (emphasis added). Contestant purports to contest the “result of the November 3, 2020 general election for President and Vice President,” but no such election exists. Rather, “[w]hen *presidential electors are to be elected*, the ballot shall not list the individual names of the candidates for presidential electors but shall list the names of each political party and body and the names of the political party or body candidates for the office of President and Vice President.” O.C.G.A. § 21-2-379.5(e) (emphasis added); *see* O.C.G.A. § 21-2-285(e). The Georgia Supreme Court has confirmed that presidential elections in Georgia are actually “election[s] for presidential electors.” *Rose v. State*, 107 Ga. 697 (1899); *Franklin v. Harper*, 205 Ga. 779, 785 (1949) (describing an “election . . . for presidential electors”); *Moore v. Smith*, 140 Ga. 854 (1913) (same). The U.S. Supreme Court reiterated this understanding in a decision issued earlier this year. *See Chiafalo v. Washington*, 140 S. Ct. 2316, 2319 (2020) (“Every four years, millions of Americans cast a ballot for a presidential candidate. Their votes, though, actually go toward selecting members of the Electoral College, whom each State appoints based on the popular returns. Those few ‘electors’ then choose the President.”). The Biden Electors are therefore proper “defendants” as “[t]he person[s] whose nomination or election is contested.” O.C.G.A. § 21-2-520(2)(A).

Though Contestant has erroneously named the wrong individuals as “candidates” in his Petition, if this contest is to proceed, the Court should permit the Biden Electors to exercise their statutory right to appear before the Court as if the contest were properly pled. *See* Pet. ¶ 6 (improperly identifying “Governor and Secretary of State” as defendants and “Joseph R. Biden,

Kamala D. Harris; Donald J. Trump and Michael R. Pence; and Jo Jorgenson and Jeremy ‘Spike’ Cohen” as the candidates). Granting the Biden Electors’ intervention motion per their statutory right is necessary to the fairness and validity of this contest.

**B. The Biden Electors are otherwise entitled to intervene as a matter of right under O.C.G.A. § 9-11-24(a)(2).<sup>6</sup>**

Even absent their statutory right to intervene, the Biden Electors easily meet Georgia’s traditional test for motions to intervene as of right. Specifically, O.C.G.A. § 9-11-24(a)(2) provides that after timely application “anyone *shall* be permitted to intervene” in an action “[w]hen the applicant claims an interest relating to” the subject matter of the action and the applicant “is so situated that the disposition of the action may as a practical matter impair or impede his ability to protect that interest, unless the applicant’s interest is adequately represented by existing parties.”<sup>7</sup> O.C.G.A. § 9-11-24(a)(2) (emphasis added). Georgia courts have described this as a three-part inquiry, consisting of “[1] interest, [2] impairment resulting from an unfavorable disposition, and

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<sup>6</sup> The Georgia Supreme Court has clarified that “[t]he [Civil Practice Act (CPA)] ‘shall apply to all special statutory proceedings except to the extent that specific rules of practice and procedure in conflict [with it] are expressly prescribed by law.’” *Martin v. Fulton Cnty. Bd. of Registration & Elections*, 307 Ga. 193, 210 (2019) (quoting O.C.G.A. § 9-11-81). Thus, it follows that “the CPA provides background [procedural] rules in election contests—which are civil actions—except to the extent the Election Code sets forth ‘specific rules of practice and procedure’ that conflict with the CPA.” *Id.* The Election Code does not provide intervention rules that conflict with the CPA’s intervention provisions; rather, it only grants certain statutory rights to intervene that are *already contemplated* by O.C.G.A. § 9-11-24. *See, e.g.*, O.C.G.A. §§ 21-2-32(a); § 21-2-524(f).

<sup>7</sup> “[W]hether a motion to intervene is timely is a decision entrusted to the sound discretion of the trial court.” *Kroger v. Taylor*, 320 Ga. App. 298, 298 (2013) (quoting *Payne v. Dundee Mills, Inc.*, 235 Ga. App. 514, 515(1) (1998)). “But where intervention appears before final judgment, where the rights of the intervening parties have not been protected, and where the denial of intervention would dispose of the intervening parties’ cause of action, intervention should be allowed and the failure to do so amounts to an abuse of discretion.” *Id.* This request for intervention was filed only five days after Contestant filed his petition, the same day he filed his supporting exhibits, and before any hearing in this contest. Accordingly, it is timely.

[3] inadequate representation.” *See Baker v. Lankford*, 306 Ga. App. 327, 329 (2010). The Biden Electors satisfy each prong.

*First*, the Biden Electors clearly have a direct interest in defending the certification of their own electoral victory from frivolous attacks. Under Georgia law, “the interest of the intervenor must be of such a direct and immediate character that he will either gain or lose by the direct effect of the judgment, and must be created by the claim in suit.” *State Farm Mut. Auto. Ins. Co. v. Jiles*, 115 Ga. App. 193, 195 (1967). There is no question that the Biden Electors will “gain or lose by the direct effect of [a] judgment” in this suit that seeks to prevent their appointment to the Electoral College in direct contravention of the decision of Georgia’s electorate. *See id.* The Biden Electors also have a direct interest in defending and supporting the will of the 2,474,507 Georgia voters who supported their election. *See, e.g., Bay Cnty. Democratic Party v. Land*, 347 F. Supp. 2d 404, 422 (E.D. Mich. 2004) (“political parties and candidates have standing to represent the rights of voters”); *Penn. Psychiatric Soc’y v. Green Spring Health Servs., Inc.*, 280 F.3d 278, 288 n.10 (3d Cir. 2002) (“candidates for public office may be able to assert the rights of voters”); *Walgren v. Bd. of Selectmen of Amherst*, 519 F.2d 1364, 1365 n.1 (1st Cir. 1975) (same).<sup>8</sup>

*Second*, there is no question that Contestant’s requests will impair the Biden Electors’ interests. He seeks to render the Biden Electors’ victory “null and void.” *See* Pet., Prayer for Relief ¶¶ 1-3. Then, he asks the Court to prevent certification of an election that has *already been certified*

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<sup>8</sup> Georgia courts regularly apply principles from federal caselaw to the scope of a party’s interest in litigation, for example, to determine whether a party’s injury is sufficient to confer standing to litigate a case. *See Feminist Women’s Health Ctr. v. Burgess*, 282 Ga. 433, 434 (2007) (collecting Georgia cases that look to federal law to resolve issues of standing); *Aldridge v. Ga. Hosp. & Travel Ass’n*, 251 Ga. 234, 235 (1983) (reviewing federal precedent to determine “associational standing”). Though the interest required for intervention is less than that required for standing, this Court should still look to instructive federal case law.

as a victory for the Biden Electors so that the General Assembly can appoint its own slate of electors—presumably for Contestant’s preferred candidate. *Id.* ¶ 5. In the alternative, he seeks a “second Presidential election,” *id.* ¶ 7, which would operate only to delay and obstruct the finality of this election, which the Biden Electors won. Put simply, the Biden Electors have been elected by the voters of Georgia to cast Georgia’s sixteen electoral votes for President-Elect Biden, and the Court should not permit Contestant, as a single voter disappointed in that outcome, to use the state judiciary as a prop in his efforts to undermine democracy.

*Finally*, the Biden Electors’ interests cannot adequately be represented by the State Defendants, who are not proper defendants in this suit to begin with. *See Martin*, 307 Ga. at 193 n.1 (noting the trial court’s dismissal of the Georgia Secretary of State as a defendant in an election contest); *see also* Br. of Amicus Curiae Sec’y of State, *Coal. of Good Governance v. Fulton Cnty. Bd. of Registration & Elections*, No. S19A0769, 2019 WL 2010128, at \*1 n.1 (Ga. May 2, 2019), *Martin*, 307 Ga. 193 (noting “the superior court’s dismissal of the Secretary as an improper party to [an] election contest petition”). To the extent they remain parties to the lawsuit, their stake in this lawsuit is defined solely by their statutory duties to implement the electoral process. The Secretary of State, as the chief elections officer, is responsible for the general administration of the state laws affecting voting. *See* O.C.G.A. §§ 21-2-50, 21-2-384. Because the State is not institutionally designed to be an advocate for electing the President-Elect or protecting individual voters’ rights, it cannot adequately represent the interests of the Biden Electors, whose mission is just that.

Additionally, it should carry no weight that Contestant has improperly listed President-Elect Biden—who does have similar interests to the proposed intervenors—as a candidate in the

contested election. Under Georgia law, he was not the *candidate* in the election for presidential electors. *See supra* Section III.A. This means that he is not properly considered a “litigant” under the Election Contest rules and is not able to present “any right of interest or claim.” O.C.G.A. § 21-2-524(f).

**C. In the alternative, the Biden Electors request the Court grant them permission to intervene under O.C.G.A. § 9-11-24(b).**

If the Court does not grant intervention as a matter of right, the Biden Electors respectfully request that the Court exercise its discretion to allow them to intervene under O.C.G.A. § 9-11-24(b). Permissive intervention is appropriate “[w]hen an applicant’s claim or defense and the main action have a question of law or fact in common.” O.C.G.A. § 9-11-24(b)(2). “In exercising its discretion the court shall consider whether the intervention will unduly delay or prejudice the adjudication of the rights of the original parties.” *Id.*

The Biden Electors easily meet the requirements for permissive intervention. *First*, the Biden Electors and the State will inevitably raise common questions of law and fact in defending this lawsuit and the elections process. *Second*, given the early stage of this litigation, intervention will not unduly delay or prejudice the adjudication of the rights of the original parties. To the contrary, the Biden Electors are prepared to proceed in accordance with any schedule the Court establishes and have an interest in moving as expeditiously as possible. Their intervention will only serve to contribute to the full development of the factual and legal issues before the Court.

#### **IV. CONCLUSION**

For the reasons stated above, the Biden Electors respectfully request that the Court grant their motion to intervene as a matter of right under O.C.G.A. § 9-11-24(a) or, in the alternative, permit them to intervene under O.C.G.A. § 9-11-24(b). The Biden Electors have submitted a

proposed motion to dismiss the Contestants' Petition for consideration by the Court if the Biden Electors are granted permission to intervene under either provision.

Dated: November 30, 2020.

Respectfully submitted,

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