

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

**COALITION FOR GOOD
GOVERNANCE, et al.,**

Plaintiffs,

v.

BRIAN KEMP, et al.,

Defendants.

Civil Action No. 21-cv-02070-JPB

PLAINTIFFS' REPLY IN SUPPORT MOTION TO STAY

Plaintiffs have moved to stay this case until March 1, 2023, and to extend the current deadlines in the case to May 15, 2023 (for discovery), and June 15, July 6, and July 20, 2023 (for summary judgment motions, responses and replies, respectively). Defendants and Intervenor have opposed the motion, but suggested that as an alternative to the granting of the stay that the Court align the discovery deadline for this case with the deadline in the Consolidated SB 202 case, which is March 17, 2023.

Plaintiffs vehemently disagree with Defendants' largely irrelevant attack on the Plaintiffs. Plaintiffs have been unable to prosecute this case in the past two

months because of the completely unforeseeable discovery in the *Curling* case of the statewide voting system breach emanating in Coffee County that has completely consumed lead Plaintiff Coalition for Good Governance's resources, and will continue to do so for several weeks. Though Plaintiffs believe that a stay is appropriate given these exceptional circumstances under the cases cited by Plaintiffs, Plaintiffs have no objection to aligning the discovery in this case with the deadline in the Consolidated SB 202 cases if that is beneficial and efficient for the Court.

This 19th day of September, 2022.

/s/ Bruce P. Brown

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CERTIFICATE OF SERVICE AND CERTIFICATE OF COMPLIANCE WITH
LOCAL RULE 5.1

Pursuant to N.D. Ga. L.R. 5.1(C), I certify that the foregoing was prepared using Times New Roman 14 font. I electronically filed this using CM/ECF, thus electronically serving all counsel of record.

This 19th day of September, 2022.

/s/ Bruce P. Brown

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