

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

SIXTH DISTRICT OF THE AFRICAN) METHODIST EPISCOPAL CHURCH,) a Georgia nonprofit organization, et al.)) Plaintiffs,)) v.)) BRIAN KEMP, Governor of the State of) Georgia in his official capacity, et al.,)) Defendants.)	)	Master Case No.: 1:21-mi-55555-JPB Civil Action File No.: 1:21-cv-01284-JPB
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**ANSWER of COLUMBIA COUNTY DEFENDANTS to SECOND
AMENDED COMPLAINT**

NOW COME Defendants Columbia County Board of Elections; Ann Cushman, Wanda Duffie, and Larry Wiggins, Members of the Columbia County Board of Elections, in their official capacities; Columbia County Board of Registrars; and Nancy L. Gay, Columbia County Chief Registrar, in her official capacity, (hereinafter collectively “these defendants”); and respond to the Plaintiffs’ Second Amended Complaint as follows:¹

¹ These defendants acknowledge that the Court’s Order granting Plaintiff’s Motion for Leave to File a Second Amended Complaint (1:21-cv-01284-LPB, Dkt. 220) states that no response to the Second Amended Complaint is required from the defendants. These defendants nonetheless bring this answer as a precautionary measure given that one or more allegations contained in the Second Amended Complaint may differ from those contained in the First Amended Complaint. *See, e.g.* Second Amended

FIRST DEFENSE

The Amended Complaint fails to state a claim against these defendants upon which relief may be granted.

SECOND DEFENSE

The Amended Complaint does not contain any specific allegations regarding these defendants and does not allege any act or omission of these defendants which might subject them to liability in this lawsuit.

THIRD DEFENSE

These defendants were not responsible for the drafting or enactment of S.B. 202 and do not have discretion over whether to comply with validly-passed state election laws. These defendants show that they will abide by any order of this Court regarding the constitutionality of S.B. 202 or injunctive relief granted as to the enforcement of its provisions and would have done so without being named as defendants in this litigation.

FOURTH DEFENSE

The claims raised in the Second Amended Complaint are barred, in whole or in part, by the Eleventh Amendment to the United States Constitution.

FIFTH DEFENSE

Complaint at ¶ 321 (adding “including pursuant to 42 U.S.C. § 1983” as a basis for Plaintiff’s First Claim For Relief).

The claims raised in the Second Amended Complaint are barred, in whole or in part, by sovereign immunity, qualified immunity, and official immunity.

SIXTH DEFENSE

The Second Amended Complaint names an improper party to this action and fails to name an indispensable party to this action.

SEVENTH DEFENSE

Plaintiffs lack standing to bring this action and to assert the claims brought in the Second Amended Complaint against these defendants.

EIGHTH DEFENSE

Plaintiffs' claims, in whole or in part, are not ripe for review or are moot.

NINTH DEFENSE

Plaintiff's claims, in whole or in part, are barred by the doctrines of estoppel, laches or waiver.

TENTH DEFENSE

These defendants respond to the specific allegations contained in the Plaintiffs' Second Amended Complaint as follows:

1. These defendants admit only that the cited authorities speak for themselves and deny any allegations contained in this paragraph inconsistent with the plain language of those authorities.

2. This paragraph requires no response. To the extent a response is expected, these defendants deny that they are liable to Plaintiffs in any way.

3. This paragraph requires no response. To the extent a response is expected, these defendants deny that they are liable to Plaintiffs in any way.

4. These defendants deny any allegations contained in this paragraph that may be directed toward them.

5. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

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22. These defendants deny any allegations contained in this paragraph that may be directed toward them.

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238. These defendants admit only that the provisions of Georgia law predating the enactment of S.B. 202 speak for themselves and deny any allegations contained in this paragraph inconsistent with the plain language of those provisions.

239. This paragraph is directed to another defendant and does not require a response from these defendants. To the extent a response is expected, these defendants deny that they are liable to Plaintiffs in any way.

240. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

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262. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

263. These defendants admit only that the provisions of Georgia law predating the enactment of S.B. 202 speak for themselves and deny any allegations contained in this paragraph inconsistent with the plain language of those provisions.

264. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

265. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

266. These defendants admit only that the provisions of Georgia law predating the enactment of S.B. 202 speak for themselves and deny any allegations contained in this paragraph inconsistent with the plain language of those provisions.

267. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

268. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

269. This paragraph is directed to another defendant and does not require a response from these defendants. To the extent a response is expected, these defendants deny that they are liable to Plaintiffs in any way.

270. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

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283. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

284. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

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286. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

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289. This paragraph is directed to another defendant and does not require a response from these defendants. To the extent a response is expected, these defendants deny that they are liable to Plaintiffs in any way.

290. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

291. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

292. These defendants deny any allegations contained in this paragraph that may be directed toward them.

293. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

294. These defendants deny any allegations contained in this paragraph that may be directed toward them.

295. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

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308. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

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310. These defendants deny any allegations contained in this paragraph that may be directed toward them.

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318. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

319. These defendants deny any allegations contained in this paragraph that may be directed toward them.

320. These defendants incorporate by reference all prior paragraphs as though fully set forth herein.

321. These defendants admit only that the referenced provisions of law speak for themselves and deny any allegations contained in this paragraph inconsistent with the plain language of said statutes.

322. These defendants deny any allegations contained in this paragraph that may be directed toward them.

323. These defendants deny any allegations contained in this paragraph that may be directed toward them.

324. These defendants deny any allegations contained in this paragraph that may be directed toward them.

325. These defendants incorporate by reference all prior paragraphs as though fully set forth herein.

326. These defendants deny any allegations contained in this paragraph that may be directed toward them.

327. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

328. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

329. These defendants incorporate by reference all prior paragraphs as though fully set forth herein.

330. These defendants admit only that Plaintiffs bring suit pursuant to 42 U.S.C. § 1983, but deny that they are liable to Plaintiffs in any way.

331. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

332. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

333. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

334. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

335. These defendants deny any allegations contained in this paragraph that may be directed toward them.

336. These defendants incorporate by reference all prior paragraphs as though fully set forth herein.

337. These defendants admit only that 42 U.S.C. § 12132 speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that statute and deny any allegations contained in this paragraph that may be directed toward them.

338. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

339. These defendants admit that they are subject to the requirements of Title II of the ADA and state that they comply with those requirements.

340. These defendants admit only that 28 C.F.R. § 35.130(b)(8) speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that regulation.

341. These defendants admit only that 28 C.F.R. § 35.130(b)(1) speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that regulation.

342. These defendants admit only that 28 C.F.R. § 35.130(b)(3) speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that regulation.

343. These defendants admit only that 28 C.F.R. § 35.130(b)(7) speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that regulation.

344. These defendants deny any allegations contained in this paragraph that may be directed toward them.

345. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions and deny any allegations contained in this paragraph that may be directed toward them.

346. These defendants deny any allegations contained in this paragraph that may be directed toward them.

347. These defendants deny any allegations contained in this paragraph that may be directed toward them.

348. These defendants incorporate by reference all prior paragraphs as though fully set forth herein.

349. These defendants admit only that 29 U.S.C. § 794 speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that statute.

350. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

351. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

352. These defendants are without knowledge or information sufficient to admit or deny the allegations contained in this paragraph.

353. These defendants admit only that 29 U.S.C. § 794 speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that statute.

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356. These defendants admit only that 29 U.S.C. § 794 speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that statute.

357. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions and deny any allegations contained in this paragraph that may be directed toward them.

358. These defendants deny any allegations contained in this paragraph that may be directed toward them.

359. These defendants admit only that Section 10101(a)(2)(B) of the Civil Rights Act speaks for itself and deny any allegations contained in this paragraph inconsistent with the plain language of that statute.

360. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

361. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

362. These defendants admit only that the provisions of S.B. 202 speak for themselves and deny any allegations in this paragraph inconsistent with the plain language of those provisions.

363. These defendants deny any allegations contained in this paragraph that may be directed toward them.

ELEVENTH DEFENSE

To the extent any response is required to Plaintiffs' Prayer for Relief, these defendants deny that they are liable to Plaintiffs in any way.

TWELFTH DEFENSE

Any allegations contained in Plaintiffs' Amended Complaint that are not admitted, denied, or otherwise responded to above are hereby specifically denied.

WHEREFORE, these defendants pray that judgment be rendered in their behalf, that they be dismissed without costs, that they recover their attorneys' fees for defending this action and for such other and further relief as this Court may deem just and proper.

This 1st day of August, 2024.

/s/ William J. Keogh, III
William J. Keogh, III
Georgia Bar No. 415781
*Attorney for Columbia County Board
of Elections; Ann Cushman, Wanda
Duffie, and Larry Wiggins, Members
of the Columbia County Board of
Elections, in their official capacities;*

*Columbia County Board of
Registrars; and Nancy L. Gay,
Columbia County Chief Registrar, in
her official capacity*

Of Counsel:
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Post Office Box 1564
Augusta, Georgia 30903-1564
(o) 706-722-4481 | (f) 706-722-9779
wkeogh@hullbarrett.com

CERTIFICATE OF COMPLAINT

Pursuant to LR 7.1, NDGa and LR 5.1, NDGa, the undersigned counsel hereby certifies that the foregoing document complies with the font and point selections approved by the Court in that it has been prepared in Times New Roman, 14-point font.

/s/ William J. Keogh, III

William J. Keogh, III

Georgia Bar No. 415781

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2024 I electronically filed the foregoing COLUMBIA COUNTY DEFENDANTS' ANSWER TO AMENDED COMPLAINT with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel and/or parties in this matter.

/s/ William J. Keogh, III

William J. Keogh, III
Georgia Bar No. 415781