

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

IN RE GEORGIA SENATE BILL 202	*	
	*	
	*	CIVIL ACTION FILE
	*	
	*	NO. 1:21-mi-55555-JPB
	*	
SIXTH DISTRICT OF THE AFRICAN	*	
METHODIST EPISCOPAL CHURCH	*	CIVIL ACTION FILE NO.
a Georgia nonprofit organization, et al.,	*	
	*	1:21-cv-01284-JPB
	*	
Plaintiffs,	*	
	*	
vs.	*	
	*	
BRIAN KEMP, Governor of the State	*	
of Georgia in his official capacity, et al.,	*	
	*	
Defendants.	*	

LIMITED ANSWER AND RESPONSIVE PLEADINGS OF
THE MACON-BIBB COUNTY DEFENDANTS TO
REFLECT PROPER PARTY DESIGNATIONS
FOR SECOND AMENDED COMPLAINT

COME NOW THE MACON-BIBB COUNTY BOARD OF ELECTIONS;
MIKE KAPLAN, JOEL HAZARD, KAREN EVANS-DANIEL, ROBERT
ABBOTT, and THOMAS ELLINGTON, Members of the Macon-Bibb County
Board of Elections, in their official capacities; THOMAS GILLON, Macon-
Bibb County Elections Supervisor, in his official capacity; and YASHICA
KENDRICK, Macon-Bibb County Chief Registrar, in her official

capacity, named Defendants in the above-styled civil action, and make and file this *Limited Answer and Responsive Pleadings of the Macon-Bibb County Defendants to Reflect Proper Party Designations for Second Amended Complaint* as follows:

THE PROPER MACON-BIBB COUNTY DEFENDANTS

These Defendants, as listed in the introductory paragraph above, are the proper Macon-Bibb County Defendants as of today's date. In the caption of their *Second Amended Complaint*, Plaintiffs named Veronica Seals as the Chief Registrar for Macon-Bibb County; however, Yashica Kendrick has since taken over that role.

Plaintiffs also named the Bibb County Board of Registrars as a Defendant, but this entity does not exist. The Macon-Bibb County Board of Elections succeeded to the rights and duties of the Bibb County Registrars by local act of the State legislature in 1969. See 1969 Ga. Laws, Pg. 3331, Sec. 8.

In addition, although Plaintiffs amended the caption of their *Second Amended Complaint* to reflect the current members of the Macon-Bibb County Board of Elections and the current Elections Supervisor for Macon-Bibb County, the numbered paragraphs of the *Second Amended Complaint* continue to reflect that Herbert Spangler, Rinda Wlson, Henry Ficklin, Cassandra Powell, and Jeanetta R. Watson fill these roles.

These Defendants have no objection to an Order being entered to update the parties in accordance with the foregoing; however, pursuant to this Court's *Order Granting Plaintiffs' Unopposed Motion for Leave to File Second Amended Complaint* on January 18, 2024 (Doc. 792), the Macon-Bibb County Defendants do not herein seek to amend the substantive defenses or responses contained in the initial *Answer and Responsive Pleadings of the Macon-Bibb County Defendants* filed on January 21, 2022 (Doc. 49).

As such, this *Limited Answer* is being filed only to address remaining deficiencies in party identification, and the Macon-Bibb County Defendants otherwise maintain the answers and responsive pleadings set forth in the initial *Answer and Responsive Pleadings of the Macon-Bibb County Defendants*. To the extent any further answer or responsive pleadings are required in response to Plaintiffs' *Second Amended Complaint*, the Macon-Bibb County Defendants hereby generally DENY each and every such allegation.

Respectfully submitted this 1st day of August, 2024.

/s/ Grace Simms Martin
WILLIAM H. NOLAND
State Bar No. 545605
william@nolandlawfirmllc.com
GRACE SIMMS MARTIN

State Bar No. 279182
grace@nolandlawfirmllc.com
Attorneys for the Macon-Bibb County
Defendants

NOLAND LAW FIRM, LLC
5400 Riverside Drive, Suite 205
Macon, GA 31210
(478) 621-4980 (telephone)
(478) 621-4982 (facsimile)

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing has been prepared in accordance with the font type and margin requirements set forth in Local Rule 5.1, using Century Schoolbook font and 13-point type.

This 1st day of August, 2024.

/s/ Grace Simms Martin

WILLIAM H. NOLAND

State Bar No. 545605

william@nolandlawfirmllc.com

GRACE SIMMS MARTIN

State Bar No. 279182

grace@nolandlawfirmllc.com

*Attorneys for the Macon-Bibb County
Defendants*

NOLAND LAW FIRM, LLC
5400 Riverside Drive, Suite 205
Macon, GA 31210
(478) 621-4980 (telephone)
(478) 621-4982 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that I have filed the foregoing using the CM/ECF system,
which will send a notice of electronic filing to all counsel of record.

This 1st day of August, 2024.

/s/ Grace Simms Martin

WILLIAM H. NOLAND

State Bar No. 545605

william@nolandlawfirmllc.com

GRACE SIMMS MARTIN

State Bar No. 279182

grace@nolandlawfirmllc.com

*Attorneys for the Macon-Bibb County
Defendants*

NOLAND LAW FIRM, LLC
5400 Riverside Drive, Suite 205
Macon, GA 31210
(478) 621-4980 (telephone)
(478) 621-4982 (facsimile)