

**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, a Georgia	:	CIVIL ACTION FILE NO.:
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.	:	
	:	

**CLARKE COUNTY DEFENDANTS' AFFIRMATIVE DEFENSES
AND ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

COME NOW, Defendants CLARKE COUNTY BOARD OF ELECTIONS AND VOTER REGISTRATION; WILLA JEAN FAMBROUGH, HUNAID QADIR, ANN TILL, ROCKY RAFFLE and ADAM SHIRLEY, in their official capacities as Members of the Clarke County Board of Elections and Voter Registration; and CHARLOTTE SOSEBEE, in her official capacity as Director of

the Clarke County Elections Department (collectively, the “Clarke Defendants”), and file their Answer and Affirmative Defenses showing the Court as follows:¹

AFFIRMATIVE DEFENSES

FIRST DEFENSE

Plaintiffs lack standing to bring all or a portion of their claims against the Clarke Defendants.

SECOND DEFENSE

Plaintiffs have failed to state a claim upon which relief may be granted against the Clarke Defendants.

THIRD DEFENSE

Clarke 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. Clarke 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

¹ Clarke County Election Defendants note that both Plaintiff’s Motion for Leave to File a Second Amended Complaint [1:21-cv-01284-JPB, Doc. 219] and the Court’s Order granting that motion [1:21-cv-01284-JPB, Doc. 220] note that no response would be required from Defendants to the Second Amended Complaint. However, Clarke County Election Defendants file this Answer primarily to preserve its defenses and do so out of an abundance of caution.

enforcement of its provisions and would have done so without being named as defendants in this litigation.

FOURTH DEFENSE

Plaintiffs' claims are not ripe for review or are moot.

FIFTH DEFENSE

Plaintiffs' claims are barred by the doctrines of estoppel or waiver.

SIXTH DEFENSE

Plaintiffs have failed to join indispensable parties.

ANSWER TO COMPLAINT

Clarke Defendants respond to the numbered allegations as follows:

1.

Clarke Defendants admit the allegations in Paragraph 1 of the Amended Complaint.

2.

Clarke Defendants admit that Georgia's history includes periods of time in which voters of color, including voters with disabilities or voters of color with disabilities, were subject to barriers that have curtailed, severely burdened, or restricted their ballot access. Clarke Defendants neither admit nor deny the

remaining allegations in Paragraph 2, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial.

3.

The allegations in Paragraph 3, contain statements or conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

4.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 4, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

5.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 5, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

6.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 6, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

7.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 7, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

8.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 8, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

9.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 10, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

10.

The allegations in Paragraph 10, contain statements and opinions, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

11.

The allegations in Paragraph 11, contain statements and opinions, thus, the

Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

12.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 12, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

13.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 13, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

14.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 14, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

15.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 15, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

16.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 16, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

17.

Clarke Defendants admit the allegations in Paragraph 17 of the Amended Complaint.

18.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 18, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

19.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 19, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

20.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 20, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

21.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 21, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

22.

Clarke Defendants admit that the Georgia General Assembly enacted S.B. 202. The remaining allegations in Paragraph 22, contain statements or conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

23.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 23, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

24.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 24, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

25.

The allegations in Paragraph 25, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

26.

The allegations in Paragraph 26, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

27.

The allegations in Paragraph 27, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

28.

The allegations in Paragraph 28, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

29.

The allegations in Paragraph 29, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

30.

The allegations in Paragraph 30, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

31.

The allegations in Paragraph 31, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

32.

Clarke Defendants admit Plaintiff AME is a party and a nonprofit religious reorganization. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 32, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

33.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 33, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

34.

The allegations in Paragraph 34, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

35.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 35, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

36.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 36, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

37.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 37, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

38.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 38, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

39.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 39. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

40.

Clarke Defendants admit Plaintiff GAMVP is a party. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 40, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

41.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 41, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

42.

The allegations in Paragraph 42, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

43.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 43. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

44.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 44, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

45.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 45, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

46.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 46, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

47.

Clarke Defendants admit Plaintiff GAMVP is a party. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 47, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

48.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 48. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

49.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 49, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

50.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 50, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

51.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 51, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

52.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 52, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

53.

Clarke Defendants admit Plaintiff LCF Georgia is a party. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 53, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

54.

The allegations in Paragraph 54, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

55.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 48. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

56.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 56, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

57.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 57, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

58.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 50, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

59.

Clarke Defendants admit Plaintiff the Deltas Georgia is a party. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 59, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

60.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 60, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

61.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 61. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

62.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 62, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

63.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 63, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

64.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 64, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

65.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 65, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

66.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 65, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

67.

Clarke Defendants admit Plaintiff ADAPT is a party. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 67, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

68.

The allegations in Paragraph 68, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

69.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 69. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

70.

Clarke Defendants admit Plaintiff Georgia Advocacy Office is a party. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 70, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

71.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 71, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

72.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 73, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

73.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 73, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

74.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 74, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

75.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 75, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

76.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 76, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

77.

The allegations in Paragraph 77, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

78.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 78, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

79.

Clarke Defendants admit Plaintiff The Arc is a party. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 70, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

80.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 80, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

81.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 81, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

82.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 82, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

83.

The allegations in Paragraph 83, contain statements, opinions, and conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

84.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 84. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

DEFENDANTS

85.

Clarke Defendants admits Defendant Brian Kemp is the Governor of the State of Georgia. The remaining allegations in Paragraph 85, contain conclusions of law, thus, the Clarke Defendants deny the paragraph as pled and demand strict proof of them at trial.

86.

Clarke Defendants admits the allegations contained in paragraph 86.

87.

Clarke Defendants admits the allegations contained in paragraph 87.

88.

Clarke Defendants admits the allegations contained in paragraph 88.

89.

Clarke Defendants admits the allegations contained in paragraph 89.

90.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 90, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

91.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 91, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

92.

Clarke Defendants admits the allegations contained in paragraph 92.

93.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 93, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

94.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 94, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

95.

Clarke Defendants admits the allegations contained in paragraph 95.

96.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 96, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

97.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 97, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

98.

Clarke Defendants admits the allegations contained in paragraph 98.

99.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 99, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

100.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 100, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

101.

Clarke Defendants admits the allegations contained in paragraph 101.

102.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 102, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

103.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 103, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

104.

Clarke Defendants admits the allegations contained in paragraph 104.

105.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 105, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

106.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 106, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

107.

Clarke Defendants admits the allegations contained in paragraph 107.

108.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 108, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

109.

Clarke Defendants denies the allegations contained in paragraph 109.

110.

Clarke Defendants admits the allegations contained in paragraph 110.

111. ;

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 111, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

112.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 112, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

113.

Clarke Defendants admits the allegations contained in paragraph 113.

114.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 114, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

115.

Clarke Defendants admits the allegations contained in paragraph 115.

116.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 116, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

117.

Clarke Defendants admits the allegations contained in paragraph 117.

118.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 118, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

119.

Clarke Defendants admits the allegations contained in paragraph 119.

120.

Clarke Defendants admits the allegations contained in paragraph 120.

121.

Clarke Defendants admits the allegations contained in paragraph 121.

122.

Clarke Defendants admits the allegations contained in paragraph 122.

123.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 123, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

124.

Clarke Defendants admits the allegations contained in paragraph 124.

125.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 125, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

JURISDICTION AND VENUE

126.

Clarke Defendants admits the allegations contained in paragraph 126.

127.

Clarke Defendants deny the allegations in paragraph 127 to the extent Plaintiffs contend the Clarke Defendants deprived Plaintiffs of any rights, privileges, or immunities as found in the Constitution or any federal statutes. All other allegations are denied as pled.

128.

Clarke Defendants admits the allegations contained in paragraph 128.

129.

To the extent the allegations in Paragraph 129 refers to Clarke Defendants, Clarke Defendants admit the allegations in paragraph 129. Clarke Defendants lack knowledge or

information sufficient to form a belief about the truth of the remaining allegations regarding other Defendants in Paragraph 129 of the Amended Complaint.

130.

To the extent the allegations in Paragraph 130 refers to Clarke Defendants, Clarke Defendants admit the allegations in paragraph 130. Clarke Defendants lack knowledge or information sufficient to form a belief about the truth of the remaining allegations regarding other Defendants in Paragraph 130 of the Amended Complaint.

FACTUAL ALLEGATIONS

131.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 131. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

132.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 132, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

133.

Clarke Defendants admits the allegations contained in paragraph 133.

134.

Clarke Defendants admit that Congress passed the Fifteenth Amendment on February 26, 1869. All other allegations contained within the paragraph are denied as pled.

135.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 135, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

136.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 136, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

137.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 137. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

138.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 138, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

139.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 139, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

140.

Clarke Defendants admit the allegations contained in paragraph 140.

141.

Clarke Defendants admit the allegations contained in paragraph 141.

142.

Clarke Defendants admit the allegations contained in paragraph 142.

143.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 143, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

144.

Clarke Defendants admit the allegations contained in paragraph 144.

145.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 145. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

146.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 146. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

147.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 147, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

148.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 148, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

149.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 150, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

150.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 151. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

151.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 151, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

152.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 152, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

153.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 153, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

154.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 154, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

155.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 155, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

156.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 156, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

157.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 157, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

158.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 158, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

159.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 159, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

160.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 160, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

161.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 161, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

162.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 162, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

163.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 163, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

164.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 164, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

165.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 165, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

166.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 166, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

167.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 168, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

168.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 168, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

169.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 169, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

170.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 170, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

171.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 171, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

172.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 172, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

173.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 173, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

174.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 174, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

175.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 175, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

176.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 176, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

177.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 177, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

178.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 178, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

179.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 179, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

180.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 180, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

181.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 181, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

182.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 182, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

183.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 180, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

184.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 184, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

185.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 185, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

186.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 186, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

187.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 187, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

188.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 188, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

189.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 189, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

190.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 190, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

191.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 191, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

192.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 192, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

193.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 193, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

194.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 195, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

195.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 195, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

196.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 196, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

197.

Clark Defendants admit that no Black candidate has ever been elected as Georgia's Governor. All other allegations in paragraph 197 are denied as pled.

198.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 198, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

199.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 199, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

200.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 200, and, therefore, the Clarke Defendants

deny those allegations as pled and demand strict proof of them at trial.

201.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 201, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

202.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 202, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

203.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 203, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

204.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 204, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

205.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 205, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

206.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 206, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

207.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 207, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

208.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 208, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

209.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 209, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

210.

Clarke Defendants admit that Reverend Ralphael Warnock was elected as the first Black person to represent Georgia in the United States Senate. Clarke Defendants further admit that Jon Ossoff was also elected to Georgia's other Senate seat. All other allegations in paragraph 210 are denied as pled.

211.

Clarke Defendants admit that the Georgia General Assembly passed S.B. 202. All other allegations in paragraph 211 are denied as pled.

212.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 212, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

213.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 213, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

214.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 214, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

215.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 215, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

216.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 216, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

217.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 217, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

218.

Clarke Defendants admit that Congress certified President Joe Biden and Vice President Kamala Harris as the winners of the General Election on January 7, 2021. All other allegations in paragraph 218 are denied as pled.

219.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 219. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

220.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 220, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

221.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 221, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

222.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 222, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

223.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 223, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

224.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 224, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

225.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 225, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

226.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 226, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

227.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 227, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

228.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 228, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

229.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 229, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

230.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 230, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

231.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 231, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

232.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 232, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

233.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 233, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

234.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 234, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

235.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 235, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

236.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 236, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

237.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 237, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

238.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 238, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

239.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 239, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

240.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 240. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

241.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 241. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

242.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 242. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

243.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 243. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

244.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 244. The paragraph also contains conclusions

of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

245.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 245. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

246.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 246. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

247.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 247. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

248.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 248. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

249.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 249. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

250.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 250. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

251.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 251. The paragraph also contains conclusions

of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

252.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 252. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

253.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 253. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

254.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 254. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

255.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 255, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

256.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 256. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

257.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 257. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

258.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 281. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

259.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 259. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

260.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 260. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

261.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 261. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

262.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 262. The paragraph also contains conclusions

of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

263.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 263. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

264.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 264, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

265.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 265. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

266.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 266. The paragraph also contains conclusions

of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

267.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 267. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

268.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 268, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

269.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 269, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

270.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 270, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

271.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 271, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

272.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 274, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

273.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 273, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

274.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 274, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

275.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 275, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

276.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 276, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

277.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 277, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

278.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 278, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

279.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 279, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

280.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 280, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

281.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 281, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

282.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 282, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

283.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 283, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

284.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 284, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

285.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 285, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

286.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 286, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

287.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 287, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

288.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 288. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

289.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 289, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

290.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 290. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

291.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 291, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

292.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 292. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

293.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 293. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

294.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 294, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

295.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 295, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

296.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 296, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

297.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 297, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

298.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 298, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

299.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 299, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

300.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 300, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

301.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 301, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

302.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 302, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

303.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 303, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

304.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 304, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

305.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 305, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

306.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 306. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

307.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 307, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

308.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 308, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

309.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 309, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

310.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 310, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

311.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 311, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

312.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 312, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

313.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 313, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

314.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 314, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

315.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 315, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

316.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 316, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

317.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 317, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

318.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 318, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

319.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 319, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

FIRST CLAIM FOR RELIEF

Violation of Section 2 of the Voting Rights Act

320.

Clarke Defendants incorporate all prior paragraphs by reference.

321.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 321. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

322.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 322. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

323.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 323. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

324.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 324. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

SECOND CLAIM FOR RELIEF

Fourteenth and Fifteenth Amendments

325.

Clarke Defendants incorporate all prior paragraphs by reference.

326.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 326. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

327.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 328. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

328.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 328. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

THIRD CLAIM FOR RELIEF

Freedom of Speech/Expression

329.

Clarke Defendants incorporate all prior paragraphs by reference.

330.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 330. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

331.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 331, and, therefore, the Clarke Defendants deny those allegations as pled and demand strict proof of them at trial.

332.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 332. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

333.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 333. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

334.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 334. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

335.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 335. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

FOURTH CLAIM FOR RELIEF

Title II of the Americans with Disabilities Act

336.

Clarke Defendants incorporate all prior paragraphs by reference.

337.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 337. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

338.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 338. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

339.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 339. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

340.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 340. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

341.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 341. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

342.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 342. The paragraph also contains conclusions

of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

343.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 343. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

344.

Clarke Defendants neither admit nor deny the allegations in Paragraph 344, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent a response is required from Clarke Defendants Clarke Defendants deny they have violated Title II of the Americans with Disabilities Act (ADA) and state that they will comply with Georgia law, deferring questions of constitutionality to the Court.

345.

Clarke Defendants neither admit nor deny the allegations in Paragraph 3, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent a response is required from Clarke Defendants Clarke Defendants deny they have violated Title II of the Americans with Disabilities Act

(ADA) and state that they will comply with Georgia law, deferring questions of constitutionality to the Court.

346.

Clarke Defendants neither admit nor deny the allegations in Paragraph 346, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent a response is required from Clarke Defendants Clarke Defendants deny they have violated Title II of the Americans with Disabilities Act (ADA) and state that they will comply with Georgia law, deferring questions of constitutionality to the Court.

347.

Clarke Defendants neither admit nor deny the allegations in Paragraph 347, as these allegations contain statements or conclusions of law, but demand strict proof of them at trial. To the extent a response is required from Clarke Defendants Clarke Defendants deny they have violated Title II of the Americans with Disabilities Act (ADA) and state that they will comply with Georgia law, deferring questions of constitutionality to the Court.

FIFTH CLAIM FOR RELIEF

Section 504 of the Rehabilitation Act

348.

Clarke Defendants incorporate all prior paragraphs by reference.

349.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 349. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

350.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 350. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

351.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 351. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

352.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 352. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

353.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 353. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

354.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 354. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

355.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 355. The paragraph also contains conclusions

of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

356.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 356. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

357.

Clarke Defendants deny that they have discriminated or failed to provide reasonable modifications to individuals with disabilities. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 357, and, therefore, neither admits nor denies those allegations, but demand strict proof of them at trial.

358.

Clarke Defendants deny that they have discriminated or failed to provide reasonable modifications to individuals with disabilities. Clarke Defendants have insufficient knowledge to determine the truth or falsity of the remaining allegations in Paragraph 358, and, therefore, neither admits nor denies those allegations, but demand strict proof of them at trial.

SIXTH CLAIM FOR RELIEF

Violation of the Civil Rights Act of 1964

359.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 359. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

360.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 360. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

361.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 361. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

362.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 362. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

363.

Clarke Defendants have insufficient knowledge to determine the truth or falsity of the allegations in Paragraph 363. The paragraph also contains conclusions of law, and, therefore, the Clarke Defendants deny all allegations as pled and demand strict proof of them at trial.

364.

To the extent that any paragraph has not been specifically admitted, all such paragraphs are denied for the purpose of requiring strict proof thereof.

PRAYER FOR RELIEF

1.

Paragraph 1 contains a request for relief that requires no response. To the extent a response is required from Clarke Defendants, Clarke Defendants state that they will comply with Georgia law and defer questions of constitutionality to the Court.

2.

Paragraph 2 contains a request for relief that requires no response. To the extent a response is required from Clarke Defendants, Clarke Defendants state that they will comply with Georgia law and defer questions of constitutionality to the Court.

3.

Paragraph 3 contains a request for relief that requires no response. To the extent a response is required from Clarke Defendants, Clarke Defendants deny that the requested relief is justified or appropriate.

4.

Paragraph 4 contains a request for relief that requires no response. To the extent a response is required from Clarke Defendants, Clarke Defendants deny that the requested relief is justified or appropriate.

5.

Paragraph 5 contains a request for relief that requires no response. To the extent a response is required from Clarke Defendants, Clarke Defendants deny that the requested relief is justified or appropriate.

WHEREFORE, having answered Plaintiffs' Second Amended Complaint and stated defenses and objections, Clarke Defendants respectfully request that Plaintiffs' claims be dismissed, Plaintiffs' prayers for relief be denied in each and every particular with all costs taxed to the Plaintiffs, and Clarke Defendants be granted such other relief as this Court may deem just and proper.

Respectfully submitted this 1st day of August, 2024.

JAMES BATES BRANNAN GROOVER LLP

/s/ Gregory C. Sowell
GREGORY C. SOWELL
Georgia Bar No. 668655
One Press Place, Suite 20
Athens, GA 30601
(706) 215-8330
(706) 215-8322(Fax)
gsowell@jamesbatesllp.com

/s/ James F. Banter
JAMES F. BANTER
Georgia Bar No. 581797
231 Riverside Dr.
Macon, GA 31204
(478) 749-9992
jbaxter@jamesbatesllp.com

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.

JAMES BATES BRANNAN GROOVER LLP

/s/ Gregory C. Sowell
GREGORY C. SOWELL
Georgia Bar No. 668655
One Press Place, Suite 20
Athens, GA 30601
(706) 215-8330
(706) 215-8322(Fax)
gsowell@jamesbatesllp.com

/s/ James F. Banter
JAMES F. BANTER
Georgia Bar No. 581797
231 Riverside Dr.
Macon, GA 31204
(478) 749-9992
jbaxter@jamesbatesllp.com

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of August, 2024, I electronically filed the foregoing, *CLARKE COUNTY DEFENDANTS' AFFIRMATIVE DEFENSES AND ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT*, with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

JAMES BATES BRANNAN GROOVER LLP

/s/ Gregory C. Sowell
GREGORY C. SOWELL
Georgia Bar No. 668655
One Press Place, Suite 20
Athens, GA 30601
(706) 215-8330
(706) 215-8322(Fax)
gsowell@jamesbatesllp.com

/s/ James F. Banter
JAMES F. BANTER
Georgia Bar No. 581797
231 Riverside Dr.
Macon, GA 31204
(478) 749-9992
jbaxter@jamesbatesllp.com