

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

SIXTH DISTRICT OF THE
AFRICAN METHODIST
EPISCOPAL CHURCH, *a Georgia
nonprofit organization, et al.,*

Plaintiffs, Case No. 1:21-cv-01284

UNITED STATES OF AMERICA,
Plaintiff-Intervenor,

v.

BRIAN KEMP, *in his official
capacities as Governor of the State of
Georgia, et al.,*
Defendants,

REPUBLICAN NATIONAL
COMMITTEE, et al.,
Intervenor-Defendants.

IN RE GEORGIA SENATE BILL 202

Master Case No. 1:21-mi-55555

**INTERVENOR-DEFENDANTS' ANSWER
TO UNITED STATES' COMPLAINT**

Intervenors—the Republican National Committee, National Republican Senatorial Committee, National Republican Congressional Committee, and Georgia Republican Party, Inc.—answer the Complaint in Intervention of the United States (Doc. 873). Unless expressly admitted below, every allegation in the complaint is denied. Accordingly, Intervenors state:

1. SB 202 speaks for itself. The remaining allegations in this paragraph are legal conclusions to which no response is required.

2. SB 202 speaks for itself. Intervenor otherwise deny this allegation.

3. Intervenor deny that Defendants are violating the law. They otherwise lack sufficient information to admit or deny this allegation.

4. The Complaint and SB 202 speak for themselves.

5. Deny.

JURISDICTION AND VENUE

6. These legal arguments require no response.

7. These legal arguments require no response.

8. These legal arguments require no response.

PARTIES

9. Admit.

10. Admit.

11. These legal arguments require no response.

12. Intervenor admit that Brad Raffensperger is Secretary of State of the State of Georgia. This paragraph otherwise contains legal arguments requiring no response.

ALLEGATIONS

13. Intervenors lack sufficient information to admit or deny this allegation.

14. Intervenors lack sufficient information to admit or deny this allegation.

15. Intervenors lack sufficient information to admit or deny this allegation.

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30. Intervenors lack sufficient information to admit or deny this allegation.

31. Intervenors lack sufficient information to admit or deny this allegation.

32. Intervenors lack sufficient information to admit or deny this allegation.

33. The cited cases speak for themselves.

34. The cited legal authorities speak for themselves.

35. The cited statute speaks for itself.

36. Intervenors lack sufficient information to admit or deny this allegation.

37. Intervenors lack sufficient information to admit or deny this allegation.

38. SB 202 speaks for itself.

39. Intervenors lack sufficient information to admit or deny this allegation.

40. Intervenors lack sufficient information to admit or deny this allegation.

41. Intervenors lack sufficient information to admit or deny this allegation.

42. Intervenors lack sufficient information to admit or deny this allegation.

43. SB 202 speaks for itself.

44. SB 202 speaks for itself.

45. The cited statute speaks for itself.

46. The cited statutes speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

47. Intervenors lack sufficient information to admit or deny this allegation.

48. SB 202 speaks for itself.

49. SB 202 speaks for itself.

50. SB 202 speaks for itself.

51. SB 202 speaks for itself.

52. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

53. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

54. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

55. Intervenors lack sufficient information to admit or deny this allegation.

56. Intervenors lack sufficient information to admit or deny this allegation.

57. Intervenors lack sufficient information to admit or deny this allegation.

58. Intervenors lack sufficient information to admit or deny this allegation.

59. Intervenors lack sufficient information to admit or deny this allegation.

60. SB 202 and the Secretary's announcement speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

61. SB 202 speaks for itself.

62. SB 202 speaks for itself, but they deny the characterization that the law "results in a particularly short time period for requesting absentee ballots for runoff elections."

63. Intervenors lack sufficient information to admit or deny this allegation.

64. Intervenors lack sufficient information to admit or deny this allegation.

65. Intervenors lack sufficient information to admit or deny this allegation.

66. The State Election Board Rule speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

67. The State Election Board Rule speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

68. The State Election Board Rule speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

69. Intervenors lack sufficient information to admit or deny this allegation.

70. The cited news article speaks for itself. Intervenors lack sufficient information to admit or deny this allegation.

71. Intervenors lack sufficient information to admit or deny this allegation.

72. Intervenors lack sufficient information to admit or deny this allegation.

73. SB 202 speaks for itself.

74. SB 202 speaks for itself.

75. SB 202 speaks for itself.

76. SB 202 and the cited case speak for themselves. Intervenors otherwise deny this allegation.

77. Intervenors lack sufficient information to admit or deny this allegation.

78. Intervenors lack sufficient information to admit or deny this allegation.

79. Intervenors lack sufficient information to admit or deny this allegation.

80. Intervenors lack sufficient information to admit or deny this allegation.

81. Intervenors lack sufficient information to admit or deny this allegation.

82. SB 202 speaks for itself.

83. Deny.

84. SB 202 and the cited statute speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

85. SB 202 speaks for itself.

86. SB 202 speaks for itself.

87. Intervenors lack sufficient information to admit or deny this allegation.

88. Intervenors lack sufficient information to admit or deny this allegation.

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104. Intervenors lack sufficient information to admit or deny this allegation.

105. Intervenors lack sufficient information to admit or deny this allegation.

106. Intervenors lack sufficient information to admit or deny this allegation.

107. Intervenors lack sufficient information to admit or deny this allegation.

108. Intervenors lack sufficient information to admit or deny this allegation.

109. The cited statutes speak for themselves. Intervenors otherwise lack sufficient information to admit or deny this allegation.

110. Intervenors lack sufficient information to admit or deny this allegation.

111. Intervenors lack sufficient information to admit or deny this allegation.

112. Intervenors lack sufficient information to admit or deny this allegation.

113. Intervenors lack sufficient information to admit or deny this allegation.

114. Intervenors lack sufficient information to admit or deny this allegation.

115. Intervenors lack sufficient information to admit or deny this allegation.

116. The Secretary's statement speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

117. The legislative record speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

118. Intervenors lack sufficient information to admit or deny this allegation.

119. Intervenors lack sufficient information to admit or deny this allegation.

120. The legislative record speaks for itself.

121. The legislative record speaks for itself.

122. The cited article speaks for itself. Intervenors otherwise lack sufficient information to admit or deny this allegation.

123. The legislative record speaks for itself.

124. The legislative record speaks for itself.

125. The legislative record speaks for itself.

126. The legislative record speaks for itself.

127. Intervenors lack sufficient information to admit or deny this allegation.

128. The legislative record speaks for itself, but Intervenors deny the characterization that “[w]itnesses had minimal time to read and comment” on the bill.

129. The legislative record speaks for itself.

130. The legislative record speaks for itself.

131. The legislative record speaks for itself.

132. The legislative record speaks for itself.

133. The legislative record speaks for itself.

134. The legislative record speaks for itself.

135. The legislative record speaks for itself.

136. The legislative record speaks for itself.

137. The legislative record speaks for itself.

138. The legislative record speaks for itself.

139. The legislative record speaks for itself.

140. The legislative record speaks for itself.

141. The legislative record speaks for itself.

142. Deny.

143. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

144. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

145. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

146. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

147. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

148. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

149. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

150. This legal argument requires no response. To the extent any response is required, Intervenor deny the allegation.

151. Intervenor lack sufficient information to admit or deny this allegation.

152. Intervenor lack sufficient information to admit or deny this allegation.

153. Intervenors lack sufficient information to admit or deny this allegation.

154. Intervenors lack sufficient information to admit or deny this allegation.

155. Intervenors lack sufficient information to admit or deny this allegation.

156. Intervenors lack sufficient information to admit or deny this allegation.

157. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

158. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

159. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

160. This legal argument requires no response. To the extent any response is required, Intervenors deny the allegation.

161. Intervenors lack sufficient information to admit or deny this allegation.

162. Intervenors lack sufficient information to admit or deny this allegation.

163. Intervenors lack sufficient information to admit or deny this allegation.

164. The legislative record speaks for itself.

165. Deny.

166. Intervenors deny that “the Georgia General Assembly departed from its normal procedural practice in passing the bill.” The legislative record otherwise speaks for itself.

167. This legal argument requires no response.

CAUSE OF ACTION

Violation of Equal Protection

U.S. Constitution, Amendment XIV (Intentional Race Discrimination)

168. Intervenors incorporate their responses in the preceding paragraphs.

169. The Constitution speaks for itself.

170. SB 202 speaks for itself. The remaining allegations are legal arguments that require no response.

171. This legal argument requires no response.

172. This legal argument requires no response.

173. This legal argument requires no response.

174. This legal argument requires no response.

RESPONSE TO PRAYER FOR RELIEF

Intervenors deny that the United States is entitled to its requested relief.

AFFIRMATIVE DEFENSES

1. The allegations in the complaint fail to state a claim.
2. Plaintiffs' requested relief is barred by the *Purcell* principle.

Dated: August 1, 2024

Gilbert C. Dickey*
Conor D. Woodfin*
CONSOVOY MCCARTHY PLLC
1600 Wilson Boulevard, Suite 700
Arlington, Virginia 22209
(703) 243-9423

Tyler R. Green*
CONSOVOY MCCARTHY PLLC
222 S. Main Street, 5th Floor
Salt Lake City, UT 84101
(703) 243-9423

**admitted pro hac vice*

Respectfully submitted,

/s/ Gilbert C. Dickey

John E. Hall, Jr.
Georgia Bar No. 319090
William Bradley Carver, Sr.
Georgia Bar No. 115529
Baxter D. Drennon
Georgia Bar No. 241446
HALL BOOTH SMITH, P.C.
191 Peachtree Street NE, Suite 2900
Atlanta, Georgia 30303
(404) 954-5000
(404) 954-5020 (Fax)

CERTIFICATE OF COMPLIANCE

This document complies with Local Rule 5.1(B) because it uses 13-point Century Schoolbook.

/s/ Gilbert C. Dickey

CERTIFICATE OF SERVICE

On August 1, 2024, I e-filed this document on ECF, which will email everyone requiring service.

/s/ Gilbert C. Dickey