

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

INTERNATIONAL ALLIANCE OF
THEATER STAGE EMPLOYEES
LOCAL 927,

Plaintiff,

v.

JOHN FERVIER, EDWARD LINDSEY,
JANICE W. JOHNSTON, SARA
TINDALL GHAZAL, and RICK
JEFFARES, in their official capacities as
members of the Georgia State Election
Board; and PATRISE PERKINS-
HOOKER, AARON V. JOHNSON,
MICHAEL HEEKIN, and TERESA K.
CRAWFORD in their official capacities
as members of the Fulton County
Registration and Elections Board,

Defendants.

Case No. 1:23-cv-04929-JPB

MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff the International Alliance of Theatrical Stage Employees Local 927 (“IATSE”), for the reasons set forth in the memorandum of law filed concurrently with this motion and its supporting materials, respectfully moves for an order preliminarily enjoining Defendants from enforcing O.C.G.A. § 21-2-381(a)(1)(A)—which requires absentee-by-mail ballot applications to be submitted eleven days before election

day—and rejecting applications submitted by individuals voting for President and Vice President “who may be absent from their election district or unit” on election day and who apply for an absentee ballot up to seven days before election day, in accordance with the Voting Rights Act. 52 U.S.C. § 10502(d).

Plaintiffs also request that the Court waive the posting of security as otherwise required by Federal Rule of Civil Procedure 65(c). *See, e.g., New Ga. Project v. Raffensperger*, 484 F. Supp. 3d 1265, 1307 n.33 (N.D. Ga. 2020) (exercising discretion to waive security in voting rights case); *Ga. Coal. for People’s Agenda, Inc. v. Kemp*, 347 F. Supp. 3d 1251, 1268–69 (N.D. Ga. 2018) (same).

Dated: April 30, 2024

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