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

IN RE GEORGIA SENATE BILL 202	Master Case No.: 1:21-MI-55555-JPB
SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL CHURCH, *et al.*, *Plaintiffs,* v. BRIAN KEMP, Governor of the State of Georgia, in his official capacity, *et al.*, *Defendants,* REPUBLICAN NATIONAL COMMITTEE, *et al.*, *Intervenor-Defendants.*	Civil Action No.: 1:21-cv-01284-JPB
GEORGIA STATE CONFERENCE OF THE NAACP, *et al.*, *Plaintiffs,* v. BRAD RAFFENSPERGER, in his official capacity as the Secretary of State for the State of Georgia, *et al.*, *Defendants,* REPUBLICAN NATIONAL COMMITTEE, *et al.*, *Intervenor-Defendants.*	Civil Action No.: 1:21-cv-01259-JPB

AME & GEORGIA NAACP PLAINTIFFS' BRIEF IN SUPPORT OF MOTION FOR A PRELIMINARY INJUNCTION

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Page(s)

CASES

STATUTES, RULES, AND REGULATIONS

CONSTITUTIONAL AUTHORITIES

OTHER AUTHORITIES

INTRODUCTION

Georgia voters consistently face some of the longest wait times in the country. That is especially true for voters of color, and for Black voters in particular. In response to these long lines, Plaintiffs ha

June 2020 primary, some voters waited approximately eight hours, finally able to cast their ballots at about 2:45 AM. Lakin Decl. Ex. 1 ¶ 4 (Decl. of Hansel Enriquez dated May 10, 2022). At the Cochran Public Library in Henry County during the January 2021 elections, the cold turned one voter's hands purple, while another struggled to stand until a volunteer provided her a chair. Paul Decl. ¶ 10.

B. Plaintiffs Communicate Their Core Political Values By Providing Encouragement, Food, And Water To Voters

Plaintiffs in this case are religious and humanitarian organizations committed to the equal dignity of every person, as expressed through every citizen's right to vote.[2] Black Georgians' struggle to realize their full membership in the political community informs many Plaintiffs' organizational focus on voting. The Deltas' first public act was participation in the 1913 Suffragist March under the Delta Sigma Theta banner, insisting that Black women be represented at that historic event. Briggins Decl. ¶ 6. Civil rights leaders organized the march from Selma to Montgomery in an AME church, began the march on its steps, and wounded

[2] *See* Lakin Decl. Ex. 2 ¶¶ 5-8 (Decl. of Rhonda Briggins dated May 9, 2022 (Briggins Decl.)); Ex. 5 ¶¶ 4-5 (Decl. of Preye Cobham dated May 11, 2022 (Cobham Decl.)); Gaymon Decl. ¶¶ 7-9; Ex. 8 ¶¶ 7-9 (Decl. of Reginald T. Jackson (Jackson Decl.)); Ex. 9 ¶¶ 7, 10 (Decl. of Shafina Khabani dated May 20, 2022 (Khabani Decl.)); Ex. 10 ¶ 6 (Decl. of Glory Kilanko dated May 12, 2022 (Kilanko Decl.)); Ex. 14 ¶ 4 (Decl. of Stacey Ramirez dated May 11, 2022 (Ramirez Decl.)). *mirez dateReginald T. Jac*

marchers fled back to that church after being beaten on the Edmund Pettus Bridge. Jackson Decl. ¶ 9. Plaintiffs were also active in Georgia, where "discrimination was ratified into state constitutions, enacted into state statutes, and promulgated in state policy." *Brooks v. State Bd. of Elections*, 848 F. Supp. 1548, 1560 (S.D. Ga. 1994). For example, AME churches in Georgia served as organizational centers for Black leaders of the Civil Rights Movement, such as when W.W. Law led mass meetings at St. Philip AME Church in Savannah to advocate for peaceful resistance to segregation. Jackson Decl. ¶ 9. Using food to express support has a long tradition in Black Southern communities, and some Plaintiff groups in the Deep South have long provided food for those participating in civil rights marches. *See id.* ¶¶ 17-18; Briggins Decl. ¶ 19.[3]

Civic engagement for a more representative and just government remains a core tenet of Plaintiffs' missions. That mission is manifest in many of Plaintiffs' community outreach activities, such as the AME Church's "Souls to the Polls" events, the Deltas' informational sessions on how to regain the right to vote after a felony conviction, and the Georgia Muslim Voter Project's and Women Watch

[3] *See also* Jackson, *Black Women and the Legacy of Food and Protest*, EATER.COM (July 10, 2020), https://www.eater.com/2020/7/10/21308260/black-women-and-the-legacy-of-food-and-protest-history; DuBose, *Feeding the Revolution: Food in Black Liberation Movements*, STORYMAPS (Dec. 1, 2020), https://storymaps.arcgis.com/stories/99b1e7ae89fe44e38cf9c68308edae83; Ganaway, *Black Communities Have Always Used Food as Protest*, FOOD & WINE (June 4, 2020), https://www.foodandwine.com/news/black-communities-food-as-protest.

Afrika's language assistance for voters at the polls. *See*

that supports them in exercising their voting rights." Cobham Decl. ¶ 4. "The message is telling people that as a citizen, this is one of the most powerful weapons that you have"—it is a message of "strength to those standing in long lines." Kilanko Decl. ¶¶ 6, 8. This message carries particular weight in the context of Georgia's history of discrimination against Black voters. *See* Jackson Decl. ¶¶ 17-18. Indeed, another volunteer describes "line relief as a form of protest" against the government's failure to "alleviate these long wait times." Lakin Decl. Ex. 11 ¶ 10 (Decl. of Monica Kinard dated May 9, 2022 (Kinard Decl.)). "By ensuring that voters have the provisions they need to wait in long lines, our members show government officials that voters will overcome voter suppression measures that have been erected to make casting a ballot more burdensome for Black voters and other voters of color." Jackson Decl. ¶ 17; *see also* Briggins Decl. ¶ 18.

Words alone cannot adequately convey the proactive messages communicated

with no conditions attached. O.C.G.A. § 21-2-414(a). These restrictions apply within 150 feet of a polling place or 25 feet of any voter in line.

SB 202 operates as an absolute ban on line relief where long lines wrap around polling places, always within 150 feet of the building, or where there are no publicly accessible spaces within 25 feet of the voters waiting further away. Lines often extend into neighborhoods, where the only public spaces are the streets and sidewalks where voters are waiting in line. *See, e.g.*, Clarke Decl. ¶ 6 (citing a video that shows, from 4:13 to 5:19, voting lines extending far into such neighborhoods). In these settings, "any form of line relief will become functionally impossible" under SB 202. Jackson Decl. ¶ 22. Even where it is technically feasible, "voters might not realize that we are present near the polling place if we are so far away." Bray Decl. ¶ 20. Moreover, proactively approaching voters facilitates other communication. It provides a mechanism for distributing non-partisan literature, Kinard Decl. ¶¶ 13, 15, Paul Decl. ¶ 8; offering translation services and resolving "simple, nonpartisan election administration issues," Khabani Decl. ¶¶ 5-6; verbally encouraging voters to stay in line, Gaymon Decl. ¶ 14; and letting them know they can vote if they are in line before polls close, Briggins Decl. ¶ 17, Jackson Decl. ¶ 16.

Nothing in the legislative record indicates past problems with the unconditional provision of food and water to voters by non-partisan volunteers. Before Georgia enacted SB 202, existing laws already prohibited vote buying, *see*

O.C.G.A. § 21-2-570; 18 U.S.C. § 597, and improper campaigning and election solicitation at polling places, *see* O.C.G.A. § 21-2-414. Legislators pointed to nothing suggesting these laws were inadequate. In the limited debate and testimony the legislature permitted, the evidence only highlighted that existing laws were sufficient to sanction a candidate for re-entering his polling place to personally hand out pizza and to prohibit food trucks from giving away food in exchange for promises to vote. *See Meeting Before the S. Comm. on Ethics*, 2021 Leg., 156th Sess. 1:30:23-1:30:52 (Ga. 2021) (statement of Senator Sally Harrell); *Meeting Before the H. Comm. on Gov. Affairs*, 2020 Leg., 155th Sess. 36:44-37:46 (Ga. 2020) (statement of General Counsel for the Secretary of State).

I. Plaintiffs Are Likely To Succeed On The Merits Of Their Claim

A. SB 202's Line Relief Ban Criminalizes Speech And Expressive Conduct That Is Protected Under The First Amendment

SB 202 makes it a crime to "offer to give" food and drink to voters waiting in line. O.C.G.A. § 21-2-414(a). That prohibition restricts both verbal speech and expressive conduct. First, it is a direct restriction on traditional speech—particular words cannot be uttered without the threat of criminal sanction. By criminalizing those words, the law undoubtedly imposes First Amendment burdens.

Second, the ban is a restriction on non-verbal communicative conduct. Constitutional protection for freedom of speech "does not end at the spoken or written word." *Texas v. Johnson*, 491 U.S. 397, 404 (1989). The First Amendment also protects "expressive conduct," meaning nonverbal acts intended to convey a message where "at least some" viewers would understand it to communicate *some* message, even if they would not "necessarily infer a *specific* message." *Holloman ex rel. Holloman v. Harland*, 370 F.3d 1252, 1270 (11th Cir. 2004).

Plaintiffs intend to communicate a message by supporting those waiting in line to vote. Namely, they affirm the importance of voters choosing to stay in line and vote despite unreasonably long lines, and they celebrate historically disenfranchised voters' exercise of their hard-won franchise. Providing sustenance and other support communicates the importance of voting and solidarity in the face of political obstacles in a way that words alone could not. *See supra* pp. 4-8.

Those who observe Plaintiffs' line relief activities or receive their support understand them to be communicative. *See, e.g.*, Scott Decl. ¶¶ 8-10; Sutton Decl. ¶ 8; Robinson Decl. ¶ 6. Context can tr

F.3d at 1243; *see also Matthew* 25:35-45. And Plaintiffs are not handing out food and water on just any Tuesday in any public place, but on voting days by approaching people waiting to vote. Voting and voter turnout are quintessential

Racism, 491 U.S. 781, 791 (1989); *see also Boos v. Barry*, 485 U.S. 312, 320 (1988) (describing "'content-neutral' speech restrictions as those that 'are *justified* without reference to the content of the re

showing it is wildly overinclusive. The ban thus makes little sense as a means of preventing undue influence, but it is perfectly tailored to silence those who seek to provide proactive, expressive, concrete support to voters waiting in line. This means-end mismatch makes clear that the line relief ban specifically targets the messages communicated by Plaintiffs' line relief efforts, and so is content based.

The text of SB 202 itself further shows that the line relief ban is content based, as it purportedly justifies the law because of the importance of "[p]rotecting electors from improper interference, political pressure, or intimidation while waiting in line to vote." SB 202 at 6:126-129. State Defendants have likewise argued that "offering or approaching voters with things of value almost certainly would be or could be seen as a pretext (or worse) for buying votes or conducting unlawful electioneering." Mot. to Dismiss, No. 21-cv-1284, Doc. No. 87-1 at 21.

This purported justification is wholly implausible given existing electioneering bans. But even taking it as true, the ban is still explicitly intended to limit actions that "would be or could be seen" as communicating a particular message—a justification that "focuses only on the content of the speech and the direct impact that speech has on its listeners." *Boos*, 485 U.S. at 321. Like straightforward electioneering bans, the line relief ban concededly targets a particular message for suppression and so is content based. *See Burson*, 504 U.S. at 198. But unlike narrowly tailored electioneering restrictions like those at issue in

Burson, *see id.* at 208-11, the sweeping line relief ban does not survive strict scrutiny. *See infra* Pt. I.C.

ii. The Line Relief Ban Suppresses Speech In A Traditional Public Forum

Public forums "include those places

traditionally public forums." *CBS Inc. v. Smith*, 681 F. Supp. 794, 802 (S.D. Fla. 1988). Many such public forums are within 150 feet of polling places, including the streets and sidewalks where Plaintiffs provide line relief. SB 202 also criminalizes providing line relief within 25 feet of any voter in line, no matter where the line stretches. Lines in Georgia often extend many blocks away from polling places, well into inarguably public forums. *See* Bray Decl. ¶¶ 17-18; Jackson Decl. ¶ 22.

2. Alternatively, The Line Relief Ban Requires Exacting Scrutiny Because It Burdens Election-Related Expression.

Even if the criminal ban on line relief were content neutral (it is not), it would still be subject to "exacting scrutiny" because it burdens election-related expression. *McIntyre v. Ohio Elections Comm'n*, 514 U.S. 334, 347 (1995). Exacting scrutiny applies to laws that burden election-related expression even if citizens have "other means to disseminate their ideas," as the First Amendment protects a person's "right not only to advocate their cause but also to

scrutiny in both cases, explaining that petition circulation was "'core political speech' because it involves 'interactive communication concerning political change.'" *Buckley*, 525 U.S. at 186 (quoting *Meyer*, 486 U.S. at 422). The policies "produce[d] a speech diminution" by "limit[ing] the number of voices" that could convey the message, and so required exacting scrutiny. *Id.* at 194-95.

The Supreme Court has also found that restrictions of other types of election-related expression—campaign expenditure limits, *see McCutcheon v. FEC*, 572 U.S. 185, 197 (2014), and a prohibition on anonymous campaign literature—were "limitation[s] on political expression subject to exacting scrutiny," *McIntyre*, 514 U.S. at 345-46. Other courts have applied exacting scrutiny to other laws that restrict election-related expression as well. *See, e.g.*, *ACLU of Fla., Inc. v. Lee*, 546 F. Supp. 3d 1096, 1102 (N.D. Fla. 2021) (campaign contributions); *Calzone v. Summers*, 942 F.3d 415, 422-23 (8th Cir. 2019) (en banc) (lobbying fee and disclosure requirements); *Hargett*, 400 F. Supp. 3d at 722 (voter registration drives); *Marin v. Town of Southeast*, 136 F. Supp. 3d 548, 566 (S.D.N.Y. 2015) (yard signs).

Encouraging voter participation, particularly among historically excluded communities, is "interactive communication concerning political change." *Meyer*, 486 U.S. at 422. Voting is the core of *all* political change. *See Yick Wo*, 118 U.S. at 370. "A petition in support of a ballot initiative might lead to a change in one law or a few laws, but a change in the composition of the electorate can lead to the change

of any law." *Hargett*, 400 F. Supp. 3d at 724. That is true even for non-partisan advocacy. Voting itself is a political act. Advocating for voting, including by celebrating and supporting voters waiting in line, is thus core political expression at the heart of the First Amendment.

The ban on line relief burdens Plaintiffs' election-related expression by criminalizing conduct that communicates their support for the democratic process and belief that the popular will, including of disenfranchised communities, should shape the government. Moreover, many of Plaintiffs' members weave line relief together with verbal speech, celebrating voters, thanking them for casting their vote, and informing them that they will be able to vote if they stay in line. *See supra* p. 9.

Not Bombs v. City of Fort Lauderdale, 11 F.4th 1266, 1294, 1297 (11th Cir. 2021) ("*FLFNB II*"); *United States v. O'Brien*, 391 U.S. 367, 382 (1968).

C. The Line Relief Ban Cannot Survive First Amendment Scrutiny Under Any Potentially Applicable Standard

Criminalizing the unconditional provision of food and water to voters waiting in line is unjustifiable no matter the level of First Amendment scrutiny. Strict scrutiny, required because SB 202 is a content-based restriction on expression in a public forum, requires that the challenged law be "the least restrictive means of achieving a compelling state interest." *McCullen*, 573 U.S. at 478. "The purpose of the test is to ensure that speech is restricted no further than necessary to achieve the goal." *Ashcroft v. ACLU*, 542 U.S. 656, 666 (2004).

Exacting scrutiny, required because the line relief ban burdens Plaintiffs' election-related expression, requires the State to prove that the challenged restriction bears a "substantial relation" to a "sufficiently important government interest." *John Doe No. 1 v. Reed*, 561 U.S. 186, 196 (2010). Courts will uphold a restriction on

Last, intermediate scrutiny, required because tgl-l7anreqstricts expeqssionint a

electioneering near polling places. There is no evidence that non-partisan providers of line relief intend to influence voters' choices or that voters confuse their support for solicitation. Indeed, all evidence is to the contrary. *See, e.g.*, Clarke Decl. ¶ 8; Scott Decl. ¶ 8; Sutton Decl. ¶ 10; Robinson Decl. ¶¶ 7-8; Tharpe Decl. ¶ 9. Neither the former Chief of Elections of Fulton County nor the current election director of Douglas County ever learned of any improper electioneering or solicitation in the guise of line relief. *See* Lakin Decl. Ex. 3 ¶ 9 (Decl. of Dwight C. Brower dated

government interests. By contrast, "an abundance of targeted alternatives may indicate that a regulation is broader than necessary" and so cannot survive. *FLFNB II*, 11 F.4th at 1296. There are numerous such targeted alternatives here.

In the first place, electioneering close to polling places, vote buying, and voter intimidation are *already illegal*, and those laws have proven effective. *See* O.C.G.A. §§ 21-2-414, 21-2-570, 21-2-566(3)-(4), 21-2-567. There is no evidence in the legislative record that these comprehensive laws have failed to deter or detect improper electioneering or vote-buying. The Legislature made no findings even *suggesting* that unconditional provision of food and water by volunteers unaffiliated with candidates or campaigns posed any threat to election integrity or could reasonably be expected to do so in the future. To the contrary, the legislative record

But even if, contrary to the evidence, *some* further prophylactic regulations were called for, SB 202 would still burden substantially more speech than is necessary." *Id.* The Court need not look far for "a model of a narrower regulation targeting more or less the same interests." *FLFNB II*, 11 F.4th at 1296. The few other states that regulate in this area at all either include exceptions for items of small pecuniary value, such as New York's law; limit line relief prohibitions to those acting on behalf of a candidate, such as Montana's; or criminalize activity only when conducted with the *intent* to influence a voter, such as Florida's. *See*

Burns, 427 U.S. 347, 373-74 (1976). That principle applies with particular force where, as here, the protected expression i

III. The *Purcell* Principle Does Not Apply And In Any Event Does Not Preclude The Limited Relief Sought Here

The Supreme Court has recognized that "lower federal courts should ordinarily not alter the election rules on the eve of an election." *Republican Nat'l Comm. v. Democratic Nat'l Comm.*, 140 S. Ct. 1205, 1207 (2020) (citing *Purcell v. Gonzalez*, 549 U.S. 1 (2006)). This "*Purcell* principle" requires more demanding scrutiny of last-minute changes to election laws that "result in voter confusion and consequent incentive to remain away from the polls." *Purcell*, 549 U.S. at 4-5; *see also League of Women Voters of Fla., Inc. v. Fla. Sec'y of State*, --- F.4th ---, 2022 WL 1435597, at *3 (11th Cir. May 6, 2022) (non-precedential stay order). Justice Kavanaugh, in a recent concurrence joined by Justice Alito, described the *Purcell* principle's application as depending in part on "how easily the State could make the change without undue collateral effects. Changes that re

Merrill, 142 S. Ct. at 880 (Kavanaugh, J., concurring). But the Supreme Court did not apply the *Purcell* principle in that case—indeed, it did not even mention *Purcell*.

The November 2022 elections will not be held for more than five months. Unlike in *League of Women Voters*, "local elections" are not "ongoing," and an injunction would not "implicate[] voter registration" or anything else that is "currently underway." 2022 WL 1435597, at *3. Enjoining the line relief ban will involve minimal burdens, and certainly nothing nearly akin to redrawing legislative maps. Indeed, it would not require election administrators to *do* anything—it would require no changes to voting processes or election machinery, and election administrators need only return to the status quo from prior election cycles and *refrain* from enforcing a criminal ban. *Cf. Ga. Latino All. for Hum. Rights v. Deal*, 793 F. Supp. 2d 1317, 1340 (N.D. Ga. 2011) ("[B]y merely preserving the status quo, [the] injunction will impose no new and onerous burdens on the Defendants."), *aff'd in part & rev'd in part on other grounds*, 691 F.3d 1250 (11th Cir. 2012).

For example, the Spalding County Defendants identified no particular burdens in implementing a preliminary injunction against the line-relief ban, noting only that they "would not interfere with efforts by non-poll workers to distribute food or water if a Court Order so requires." Lakin Decl. Ex. 21 at 9 (Spalding Defs.' Resp. to Pls. First Interrogatories at 9). According to the former Fulton County Chief of Elections, lifting the ban "would not be burdensome on election workers or to the

Last, and as shown above, "the underlying merits are entirely clearcut in favor of the plaintiff[s]." *Merrill*, 142 S. Ct. at 881. The decision in *League of Women Voters* underscores the point. *See* 2022 WL 1435597, at *5-6. There, the district court enjoined a law prohibiting "engaging in any activity with the intent to influence or effect of influencing a voter," finding that it was both unconstitutionally vague and overbroad. *Id.* at *5. While the panel found that to be a "close[] call," it ultimately stayed that injunction because it found that the merits panel "might determine that the language the district court found problematic is limited by the surrounding examples of prohibited conduct," and that the district court's overbreadth ruling may have "failed to contend with any of the 'plainly legitimate' applications" of the law. *Id.* at *6. Not so here. Plaintiffs do not make a void-for-vagueness or overbreadth argument. And in any event, SB 202 sweeps far more broadly than the Florida provision at issue in that case, which was limited to actions *intended* to affect voters.

More importantly, the Eleventh Circuit panel found no fault with the district court's finding that line relief is expressive conduct. *See League of Women Voters of Fla., Inc. v. Lee*, --- F. Supp. 3d ---, 2022 WL 969538, at *62-65 (N.D. Fla. Mar. 31, 2022) (line relief activities "communicate[d] to ... voters that their determination to exercise the franchise is important and celebrated"). Nor could it, given clear precedent in this circuit and from the Supreme Court. *See supra* Pt. I.A.

The line relief ban is a wholly unjustified and unjustifiable bar on expressing messages of concrete support and encouragement to voters waiting in line to cast a ballot. It is a ban on giving an elderly voter handwarmers, not just so her hands don't turn blue, but also to affirm that her individual vote matters to more than just her. It is a ban on handing a hungry voter a granola bar, not only to feed him, but also to fill him with a sense of pride and duty. It is a ban on giving a thirsty voter something to drink to celebrate her civic-minded decision to make sure her voice is heard, no matter the obstacles. These actions, and this message, are part of what makes the great American experiment work. If anything threatens election integrity in Georgia, it is the law that treats these messengers like criminals.

CONCLUSION

Plaintiffs' motion for a preliminary injunction should be granted.

Jordan Harris (pro hac vice)
jordanharris@dwt.com
DAVIS WRIGHT TREMAINE LLP
920 Fifth Avenue, Suite 3300
Seattle, Washington 98104-1610
Telephone: (206) 622-3150
Facsimile: (206) 757-7700

Attorneys for Plaintiffs Georgia Muslim Voter Project, Women Watch Afrika, Latino Community Fund Georgia, and The Arc of the United States

/s/ Bryan L. Sells
Bryan L. Sells
Georgia Bar No. 635562
The Law Office of Bryan Sells, LLC
PO Box 5493
Atlanta, Georgia 31107
Tel: (404) 480-4212
Email: bryan@bryansellslaw.com

Jon Greenbaum (pro hac vice)
Ezra D. Rosenberg (pro hac vice)
Julie M. Houk (pro hac vice)
jgreenbaum@lawyerscommittee.org
erosenberg@lawyerscommittee.org
jhouk@lawyerscommittee.org
Lawyers' Committee for Civil Rights Under Law
1500 K Street NW, Suite 900
Washington, D.C. 20005
Telephone: (202) 662-8600
Facsimile: (202) 783-0857

Vilia Hayes (pro hac vice)
Neil Oxford (pro hac vice)
Gregory Farrell (pro hac vice)
Hughes Hubbard & Reed LLP
One Battery Park Plaza

/s/ *Leah C. Aden*
Leah C. Aden (pro hac vice)
laden@naacpldf.org
John S. Cusick (pro hac vice)
jcusick@naacpldf.org
NAACP LEGAL DEFENSE AND EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, New York 10006
Telephone: (212) 965-2200
Facsimile: (212) 226-7592

/s/ *Debo P. Adegbile*
Debo P. Adegbile (pro hac vice)
debo.adegbile@wilmerhale.com
Ilya Feldsherov (pro hac vice)
ilya.feldsherov@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
250 Greenwich Street
New York, New York 10007
Telephone: (212) 230-8800
Facsimile: (212) 230-8888

George P. Varghese (pro hac vice)
george.varghese@wilmerhale.com
Stephanie Lin (pro hac vice)
stephanie.lin@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000

Tania Faransso (pro hac vice)
tania.faransso@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
1875 Pennsylvania Ave. NW

New York, New York 10004-1482
Telephone: (212) 837-6000
Facsimile: (212) 422-4726

Attorneys for Plaintiffs Georgia State Conference of the NAACP, Georgia Coalition for the People's Agenda, Inc., League of Women Voters of Georgia, Inc., GALEO Latino Community Development Fund, Inc., Common Cause, and Lower Muskogee Creek Tribe

Washington, D.C. 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363

Nana Wilberforce (pro hac vice)
nana.wilberforce@wilmerhale.com
WILMER CUTLER PICKERING

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document has been prepared in accordance with the font type and margin requirements of L.R. 5.1, using font type of Times New Roman and a point size of 14.

Dated: May 25, 2022

/s/ *Leah C. Aden*
Leah C. Aden
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

Leah C. Aden
Counsel for Plaintiffs

I hereby certify that on May 25, 2022, I el