

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

NAACP, *et al.*,

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Plaintiffs,

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Case No. 1:17-cv-01427-
TCB-WSD-BBM

v.

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BRIAN KEMP, in his official capacity
as Secretary of State for the State of
Georgia,

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CONSOLIDATED CASES

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Defendant.

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AUSTIN THOMPSON, *et al.*,

*

*

Plaintiffs,

*

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v.

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*

BRIAN KEMP, in his official capacity
as Secretary of State of the State of
Georgia,

*

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Defendant.

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**DEFENDANT’S ANSWER TO NAACP PLAINTIFFS’
FIRST AMENDED COMPLAINT**

General Defenses

First Defense

Plaintiffs' Complaint fails, in whole or in part, to state a claim upon which relief may be granted.

Second Defense

Defendant denies that Plaintiffs have been subjected to the deprivation of any right, privilege, or immunities under the Constitution or laws of the United States.

Third Defense

HB 566 was not enacted with discriminatory intent.

Fourth Defense

HD 105 is not unconstitutionally racially gerrymandered.

Fifth Defense

HD 111 is not unconstitutionally racially gerrymandered.

Sixth Defense

HD 105 is not the product of unconstitutional partisan gerrymandering.

Seventh Defense

HD 111 is not the product of unconstitutional partisan gerrymandering.

Eighth Defense

HB 566 cannot be invalidated in full if either or both of HD 105 and 111 are found unconstitutional. The provisions of HB 566 that relate to those districts are severable.

Ninth Defense

The preference of African-American voters for Democratic candidates is a political preference not protected by the Voting Rights Act.

Tenth Defense

This Court's remedial powers are limited to curing any violation of the Constitution or laws of the United States.

Specific Responses

For his Answer to the NAACP Plaintiffs' First Amended Complaint, Defendant Brian Kemp, in his official capacity as Secretary of State of Georgia, states as follows:

1. In response to paragraph 1 of the Complaint, Defendant admits only that Act No. 251 (2015 Ga. L. 1413) ("H.B. 566") redistricted several Georgia House Districts, including districts 105 and 111. Defendant denies the remaining allegations in Paragraph 1.

2. In response to paragraph 2 of the Complaint, Defendant denies the allegations therein.
3. In response to paragraph 3 of the Complaint, Defendant denies the allegations therein.
4. In response to paragraph 4 of the Complaint, Defendant denies the allegations therein.
5. In response to paragraph 5 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.
6. In response to paragraph 6 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.
7. In response to paragraph 7 of the Complaint, Defendant admits that the majority of the Georgia legislature is Republican and white. Defendant admits further that all incumbents, both Republicans and Democrats, were given the opportunity to make adjustments to their districts so long as all affected members consented to the changes. Defendant denies the remaining allegations in paragraph 7.

8. In response to paragraph 8 of the Complaint, Defendant denies the allegations therein.
9. In response to paragraph 9 of the Complaint, Defendant admits only that Georgia maintains voter registration by race but not by party. Defendant denies the remaining allegations in paragraph 9.
10. In response to paragraph 10 of the Complaint, Defendant denies the allegations therein.
11. In response to paragraph 11 of the Complaint, Defendant denies the allegations therein.
12. In response to paragraph 12 of the Complaint, Defendant admits only that in 2016 white Republican incumbents defeated African-American Democratic challengers in Districts 105 and 111. Defendant denies the remaining allegation in paragraph 12.
13. In response to paragraph 13 of the Complaint, Defendant admits only that H.B. 566 was a “mid-census cycle redistricting plan.” Defendant denies the remaining allegation in paragraph 13.
14. In response to paragraph 14 of the Complaint, Defendant denies that Plaintiffs are entitled to any relief.

15. In response to paragraph 15 of the Complaint, Defendant admits the allegations therein.
16. In response to paragraph 16 of the Complaint, Defendant admits the allegations therein.
17. In response to paragraph 17 of the Complaint, Defendant admits the allegations therein.
18. In response to paragraph 18 of the Complaint, Defendant admits the allegations therein.
19. In response to paragraph 19 of the Complaint, Defendant admits the allegations therein.
20. In response to paragraph 20 of the Complaint, Defendant admits only that the Georgia State Conference of the NAACP is a non-partisan, interracial, nonprofit membership organization. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations regarding the organization's mission and its membership, and therefore denies the same. Defendant further denies that its members were subjected to race- and partisan-based redistricting in violation of the Constitution.

21. In response to paragraph 21 of the Complaint, Defendant admits that Plaintiff Lavelle Lemon is African-American and resides within Georgia House District 111 in Henry County. Defendant denies the remaining allegations in paragraph 21.
22. In response to paragraph 22 of the Complaint, Defendant admits that Plaintiff Marlon Reid is African-American and resides within Georgia House District 105 in Gwinnett County. Defendant denies the remaining allegations in paragraph 22.
23. In response to paragraph 23 of the Complaint, Defendant admits that Plaintiff Lauretha Celeste Sims is African-American and resides within Georgia House District 111 in Henry County. Defendant denies the remaining allegations in paragraph 23.
24. In response to paragraph 24 of the Complaint, Defendant admits that Patricia Smith is African-American and resides within Georgia House District 105 in Gwinnett County. Defendant denies the remaining allegations in paragraph 24.
25. In response to paragraph 25 of the Complaint, Defendant admits that Coley Tyson is African-American and resides in Georgia House District

105 in Gwinnett County. Defendant denies the remaining allegations in paragraph 25.

26. In response to paragraph 26 of the Complaint, Defendant that Secretary of State Kemp is the chief election officer for the State of Georgia and his duties are outlined in O.C.G.A. §21-2-50. Defendant denies all remaining allegations in paragraph 26.
27. In response to paragraph 27 of the Complaint, Defendant admits the allegations therein.
28. In response to paragraph 28 of the Complaint, Defendant admits that legislative districts are typically redrawn after each census but denies that redistricting in Georgia is typically limited to one redistricting after each census.
29. In response to paragraph 29 of the Complaint, Defendant admits that population changes after each decennial census require new redistricting plans but denies that redistricting in Georgia is typically limited to one redistricting after each census.
30. In response to paragraph 30 of the Complaint, Defendant admits that state legislative elections are partisan and feature a majority vote requirement in the primary and general election. Defendant denies that these features

necessarily make it more difficult for minority voters to elect candidates of choice.

31. In response to paragraph 31 of the Complaint, Defendant states that this paragraph consists of legal conclusions for which no response is needed.

To the extent a response is required, the cases speak for themselves.

32. In response to paragraph 32 of the Complaint, Defendant states that this paragraph consists of legal conclusions for which no response is needed.

To the extent a response is required the cited documents speak for themselves.

33. In response to paragraph 33 of the Complaint, Defendant states that this paragraph consists of legal conclusions for which no response is needed.

To the extent a response is required the cases speak for themselves.

34. In response to paragraph 34 of the Complaint, Defendant admits only that approximately 62.8% of Georgia's citizen voting age population is white,

31.6% is African-American, 4.4% is Hispanic, and 2.6% is Asian-

American. Defendant denies all remaining allegations in paragraph 34.

35. In response to paragraph 35 of the Complaint, Defendant admits the allegations therein only as of the time that the complaint in this action was filed and not currently.

36. In response to paragraph 36 of the Complaint, Defendants admit only that at the time the complaint was filed, there were 119 Republican state house members in Georgia, of whom 118 were white and one Hispanic, and that there were 61 Democrats in the Georgia House of whom 46 were African-American, 13 were white, 1 Asian-American and 1 Hispanic. Defendant denies that these numbers are currently accurate and denies all remaining allegations in paragraph 36.

37. In response to paragraph 37 of the Complaint, Defendant admits only that the following post-2010 redistricting plans have been adopted by the Georgia Legislature: Act No. 1EX (2011); Act No. 277 (2012); and Act No. 251 (2015). Defendant denies all remaining allegations in paragraph 38 of the Complaint.

38. In response to paragraph 38 of the Complaint, Defendant admits that Act No. 1EX (2011) was the first post-2010 redistricting plan for the Georgia House of Representatives, and that it was adopted in August, 2011. Defendant denies that the vote on Act No. 1EX (2011) was a straight party line vote, but admits that few Republicans voted against the plan and that few Democrats voted in favor of the plan. Defendant denies all remaining allegations in paragraph 38.

39. In response to paragraph 39 of the Complaint, Defendant admits that Act No. 277 was passed in February 2012. Defendant admits further that Act No. 277 modified the boundaries of 15 Georgia House Districts.

Defendant denies that the changes impacted 19 counties, however the entirety of the 15 House Districts include a total of 19 counties. Defendant denies that the vote on Act No. 277 was a straight party line vote, but admits that few Republicans voted against the plan and that few Democrats voted in favor of the plan. Defendant denies all remaining allegations in paragraph 39.

40. In response to paragraph 40 of the Complaint, Defendant admits the allegations therein.

41. In response to paragraph 41 of the Complaint, Defendant admits the allegations therein.

42. In response to paragraph 42 of the Complaint, Defendant admits that H.B. 566 amended the boundaries of 17 House Districts. Defendant denies that changes were made in all of the counties listed. The changes made were limited to Chatham, Fulton, Gwinnett, Hall, Henry, Lowndes, Newton, and Spalding counties. However, the 17

House Districts, in their entirety, do include all of the counties listed.

43. In response to paragraph 43 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 43.

44. In response to paragraph 44 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 44.

45. In response to paragraph 45 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 45.

46. In response to paragraph 46 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 46.

47. In response to paragraph 47 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 47.

48. In response to paragraph 48 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 48.

49. In response to paragraph 49 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 49.

50. In response to paragraph 50 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 50.

51. In response to paragraph 51 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the

allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 51.

52. In response to paragraph 52 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 52.

53. In response to paragraph 53 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 53.

54. In response to paragraph 54 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 54.

55. In response to paragraph 55 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 55.

56. In response to paragraph 56 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 56.

57. In response to paragraph 57 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 57.

58. In response to paragraph 58 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 58.

59. In response to paragraph 59 of the Complaint, Defendant states that some individuals have given deposition testimony regarding the allegations contained therein. The deposition testimony speaks for itself. Defendant denies the remaining allegations in paragraph 59.

60. In response to paragraph 60 of the Complaint, Defendant admits only that H.B. 566 was adopted by the Georgia House of Representatives by unanimous vote, and also adopted by the

Georgia Senate. Defendant denies the remaining allegations in paragraph 43.

61. In response to paragraph 61 of the Complaint, Defendant admits only that Senator Vincent Fort is African-American and that Representative Nix is white and chaired the House Reapportionment Committee in 2015.

Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 61 and therefore denies the same.

62. In response to paragraph 62 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations therein and therefore denies the same.

63. In response to paragraph 63 of the Complaint, Defendant admits only that H.B. 566 passed in the Senate by a margin on 39-14. Defendant denies that the vote was strictly along party lines and denies that all African-American Senators opposed H.B. 566. Defendant admits further that of the State's thirteen (13) African-American Senators in 2015, eight (8) voted against H.B. 566, four (4) voted in favor of H.B. 566, and one (1) was excused from the vote. Defendant admits further that one (1) white Democrat also voted for H.B. 566. Finally, Defendant admits that two (2)

white Republican Senators voted against H.B. 566. Defendant denies all remaining allegations in paragraph 63.

64. In response to paragraph 64 of the Complaint, Defendant denies the allegations therein.

65. In response to paragraph 65 of the Complaint, Defendant denies the allegations therein.

66. In response to paragraph 66 of the Complaint, Defendant admits only that no public hearings were held on H.B. 566. Defendant denies the remaining allegations in paragraph 66.

67. In response to paragraph 67 of the Complaint, Defendant denies the allegations therein.

68. In response to paragraph 68 of the Complaint, Defendant denies the allegations therein.

69. In response to paragraph 69 of the Complaint, Defendant admits only that H.B. 515, redistricting a number of the Georgia House of Representative Districts, was introduced in the 2017 legislative session but was not enacted. Defendant is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations and therefore denies the same.

70. In response to paragraph 70 of the Complaint, Defendant admits the allegations therein.

71. In response to paragraph 71 of the Complaint, Defendant admits only that during the 2012 and 2014 election cycles House District 105 had a voting age population that was 48.4% white, 32.4% African-American, 12.6% Hispanic, and 4.6% Asian. Defendant denies the remaining allegations in paragraph 71.

72. In response to paragraph 72 of the Complaint, Defendant admits the allegations therein.

73. In response to paragraph 73 of the Complaint, Defendant admits the allegations therein.

74. In response to paragraph 74 of the Complaint, Defendant admits the allegations therein.

75. In response to paragraph 75 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

76. In response to paragraph 76 of the Complaint, Defendant admits that H.B. 566 amended House District 105 by putting Precinct Lawrenceville M back together by moving out the part of that precinct that had been in

H.D. 105. Defendant admits further that H.B. 566 moved all of Precinct Harbins C into H.D. 105 and moved part of Precinct Harbins A into H.D. Finally, Defendant admits that H.B. 566 moved that part of Precinct Lawrenceville D that consists of a 72.5% African-American voting age population, into H.D. 105. Defendant is without information or knowledge sufficient to form a belief as to the truth of the remaining allegations and therefore denies the same.

77. In response to paragraph 77 of the Complaint, Defendant is without information or knowledge sufficient to form a belief as to the truth of the allegations related to the precincts bordering District 105 and therefore denies the same. Defendant admits that the numbers and percentages included in Table 1 accurately reflect the census voting age population figures for House District 105 in 2012 and currently, with the “other” category representing all persons not included in the White non- Hispanic, African-American non-Hispanic, and Hispanic categories.

78. In response to paragraph 78 of the Complaint, Defendant admits only that House District 105’s voting age population is 52.7% white, 30.4% African-American, 10.8% Hispanic, and 4.2% Asian. Defendant denies that the “combined” minority voting age population is 47.3%.

79. In response to paragraph 79 of the Complaint, Defendant admits that post-H.B. 566, the white voting age population of House District 105 increased by 4.3% and that the African-American voting age population decreased by 2%. Defendant denies that the “combined” minority voting age population decreased by 4.3%.

80. In response to paragraph 80 of the Complaint, Defendant admits the allegations therein.

81. In response to paragraph 81 of the Complaint, Defendant admits the allegations therein.

82. In response to paragraph 82 of the Complaint, Defendant admits the allegations therein.

83. In response to paragraph 83 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

84. In response to paragraph 84 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

85. In response to paragraph 85 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

86. In response to paragraph 86 of the Complaint, Defendant admits the allegations therein.

87. In response to paragraph 87 of the Complaint, Defendant admits only that under Act No. 277 (2012), House District 111's voting age population was 56.1% white, 33.2% African-American, 5.6% Hispanic, and 3.3% Asian. Defendant denies that the "combined" minority voting age population was 43.9%.

88. In response to paragraph 88 of the Complaint, Defendant admits the allegations therein.

89. In response to paragraph 89 of the Complaint, Defendant admits the allegations therein.

90. In response to paragraph 90 of the Complaint, Defendant admits the allegations therein.

91. In response to paragraph 91 of the Complaint, Defendant admits the allegations therein.

92. In response to paragraph 92 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

93. In response to paragraph 93 of the Complaint, Defendant denies the allegations therein.

94. In response to paragraph 94 of the Complaint, Defendant admits the allegations therein.

95. In response to paragraph 95 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

96. In response to paragraph 96 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

97. In response to paragraph 97 of the Complaint, Defendant denies the allegations as written. Defendant admits that after H.B. 566 the voting age population in House District 111 is 58.1% white, 31% African-American, 5.2% Hispanic, and 3.7% Asian. Defendant denies that the “combined” minority voting age population is 41.9%. Defendant further denies that Table 2 accurately reports the increase and decrease in white

and African-American voting age population changes for House District 111 since HB 515 was never enacted. Defendant further denies that all “others” are minority voters.

98. In response to paragraph 98 of the Complaint, Defendant admits the allegations therein.

99. In response to paragraph 99 of the Complaint, Defendant admits the allegations therein.

100. In response to paragraph 100 of the Complaint, Defendant admits the allegations therein.

101. In response to paragraph 101 of the Complaint, Defendant admits the allegations therein.

102. In response to paragraph 102 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

103. In response to paragraph 103 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

104. In response to paragraph 104 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

105. In response to paragraph 105 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same

106. In response to paragraph 106 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

107. In response to paragraph 107 of the Complaint, Defendant is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies the same.

108. No response is needed for paragraph 108 of Plaintiffs' Complaint.

109. In response to paragraph 109 of the Complaint, Defendant admits the allegations therein.

110. In response to paragraph 110 of the Complaint, Defendant admits only that Plaintiffs have accurately quoted Sec. 1 of the Fourteenth Amendment.

111. In response to paragraph 111 of the Complaint, Defendant denies the allegations therein.
112. In response to paragraph 112 of the Complaint, Defendant denies the allegations therein.
113. In response to paragraph 113 of the Complaint, Defendant denies the allegations therein.
114. In response to paragraph 114 of the Complaint, Defendant denies the allegations therein.
115. In response to paragraph 115 of the Complaint, Defendant denies the allegations therein.
116. In response to paragraph 116 of the Complaint, Defendant denies the allegations therein.
117. No response is needed to paragraph 117 of Plaintiffs' Complaint.
118. In response to paragraph 118 of the Complaint, Defendant denies the allegations therein.
119. In response to paragraph 119 of the Complaint, Defendant states that this paragraph consists of a series of legal conclusions for

which no response is needed. To the extent a response is needed, Defendant denies the allegations therein.

120. In response to paragraph 120 of the Complaint, Defendant states that this paragraph consists of a series of legal conclusions for which no response is needed. To the extent a response is needed, Defendant denies the allegations therein.

121. In response to paragraph 121 of the Complaint, Defendant denies the allegations therein.

122. In response to paragraph 122 of the Complaint, Defendant denies the allegations therein.

123. In response to paragraph 123 of the Complaint, Defendant denies the allegations therein.

124. In response to paragraph 124 of the Complaint, Defendant denies the allegations therein.

125. In response to paragraph 125 of the Complaint, Defendant denies the allegations therein.

126. In response to paragraph 126 of the Complaint, Defendant denies the allegations therein.

127. No response is needed to paragraph 127 of Plaintiffs' Complaint.

128. In response to paragraph 128 of the Complaint, Defendant states that this paragraph consists of a series of legal conclusions for which no response is needed. To the extent a response is needed, Defendant denies the allegations therein.

129. In response to paragraph 129 of the Complaint, Defendant denies the allegations therein.

130. In response to paragraph 130 of the Complaint, Defendant denies the allegations therein.

131. In response to paragraph 131 of the Complaint, Defendant denies the allegations therein.

132. In response to paragraph 132 of the Complaint, Defendant denies the allegations therein.

133. In response to paragraph 133 of the Complaint, Defendant denies the allegations therein.

134. In response to paragraph 134 of the Complaint, Defendant denies the allegations therein.

135. In response to paragraph 135 of the Complaint, Defendant denies the allegations therein.

RESPONSE TO PRAYER FOR RELIEF

Defendant denies that Plaintiffs are entitled to any or all of the requested relief.

All other factual averments, legal conclusions or claims for relief not expressly admitted are denied.

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

This 5th day of November, 2018.

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing Notice of Appearance of Counsel has been prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Frank B. Strickland
Frank B. Strickland

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

AUSTIN THOMPSON, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION FILE NO.:
)	1:17-CV-3856-AT
v.)	
)	
BRIAN KEMP, in his official)	
capacity as Secretary of State of the)	
State of Georgia,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day electronically filed the within and foregoing ANSWER TO FIRST AMENDED COMPLAINT with the Clerk of Court using the CM/ECF system, which will automatically send notification of such filing to counsel of record for all parties to this matter via electronic notification or otherwise.

This 5th day of November, 2018.

/s/ Frank B. Strickland
Frank B. Strickland
Georgia Bar No. 687600