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

GEORGIA STATE CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

v.

ROBYN A. CRITTENDEN,<sup>1</sup> in her official capacity as Secretary of the State for the State of Georgia

Defendant.

AUSTIN THOMPSON, et al.

Plaintiffs,

v.

ROBYN A. CRITTENDEN, in her official capacity as Secretary of the State for the State of Georgia

Defendant.

Civil Action No.

1:17-cv-01427-TCB-MLB-BBM

**CONSOLIDATED** 

# JOINT STIPULATION AND CONSENT MOTION TO DISMISS WITH PREJUDICE

<sup>&</sup>lt;sup>1</sup> Secretary of State, Robyn A. Crittenden, is substituted as a Defendant by operation of Rule 25(d), Fed. R. Civ. Proc.

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii), all Plaintiffs and Defendant Robyn A. Crittenden ("the Parties"), through undersigned counsel, agree and stipulate, and hereby respectfully file their Joint Stipulation and Consent Motion to Dismiss With Prejudice. The Parties have agreed that each party will bear its own attorneys' fees, expenses, and costs.

For the Court's convenience, a Proposed Order is attached hereto as **Exhibit A**. Stipulated and agreed this <u>14th</u> day of January, 2019.

By: /s/ William V. Custer

William V. Custer, Georgia Bar No. 202910
Jennifer B. Dempsey, Georgia Bar No. 217536
Bryan Cave Leighton Paisner LLP
One Atlantic Center, Fourteenth Floor
1201 West Peachtree Street, NW
Atlanta, GA 30309-3488
Telephone: (404) 572-6600
Facsimila: (404) 572-6000

Facsimile: (404) 572-6999 bill.custer@bclplaw.com jennifer.dempsey@bclplaw.com

Bradley S. Phillips\*
Gregory D. Phillips\*
Kenneth Trujillo-Jamison\*
Ariel Green\*
Munger, Tolles, & Olson LLP
350 South Grand Avenue, Fiftieth Floor
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100

Facsimile: (213) 683-9100 Facsimile: (213) 687-3702 Bradley.Phillips@mto.com Gregory.Phillips@mto.com Kenneth.Trujillo-Jamison@mto.com Ariel.Green@mto.com

Jon Greenbaum\* Ezra D. Rosenberg\* Julie Houk\* John Powers\* Sam Weiss \* Lawyers' Committee for Civil Rights Under Law 1401 New York Ave., NW, Suite 400 Washington, DC 20005 Telephone: (202) 662-8600 Facsimile: (202) 783-0857 igreenbaum@lawyerscommittee.org erosenberg@lawyerscommittee.org jhouk@lawyerscommittee.org jpowers@lawyerscommittee.org sweiss@lawyerscommittee.org \*Admitted pro hac vice

Counsel for the Georgia State Conference of the NAACP Plaintiffs

#### /s/Abha Khanna

Abha Khanna\* Perkins Coie, LLP 1201 Third Avenue, Ste. 4900 Seattle, WA 98101-3099

Phone: (206) 359-8000 Fax: (206) 359-9000

e-mail: AKhanna@perkinscoie.com

Marc Erik Elias\* Aria C. Branch\* Perkins Coie, LLP 700 13th St. N.W., Suite 600 Washington, D.C. 20005-3960

Phone: (202) 654-6338 Fax: (202) 654-9106

Email: MElias@perkinscoie.com
Email: ABranch@perkinscoie.com

Quinton Washington GA Bar No. 159067 Bell & Washington LLP 196 Peachtree Street SW, Suite 310 Atlanta, GA 30303 Phone: (404) 437-6641

Email: Quinton@bellwashington.com

### Counsel for the Thompson Plaintiff

#### /s/ Frank B. Strickland

Frank B. Strickland
Special Assistant Attorney General
Georgia Bar No. 687600
John J. Park Jr.
Georgia Bar No. 547812
Bryan P. Tyson
Georgia Bar No. 515411
Strickland Brockington Lewis LLP
Midtown Proscenium Suite 2200
1170 Peachtree Street NE
Atlanta, Georgia 30309
Phone: (678) 347-2200
Fax: (678) 347-2210
fbs@sbllaw.net
ijp@sbllaw.net

bpt@sbllaw.net

### /s/Cristina M. Correia

CHRISTOPHER M. CARR

Attorney General 112505 ANNETTE M. COWART 191199

Deputy Attorney General

RUSSELL D. WILLARD 760280

Senior Assistant Attorney General

CRISTINA M. CORREIA 188620

Senior Assistant Attorney General

Attorneys for Secretary of State Brian Kemp

Counsel for Defendant Secretary of State

### **CERTIFICATE OF SERVICE AND COMPLIANCE**

I hereby certify that on January 14, 2019, I served the within and foregoing JOINT STIPULATION AND CONSENT MOTION TO DISMISS WITH PREJUDICE with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

Pursuant to L.R. 7.1(D), the undersigned also hereby certifies that the foregoing **JOINT STIPULATION AND CONSENT MOTION TO DISMISS WITH PREJUDICE** has been prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(C).

This 14th day of January, 2019.

### /s/ William V. Custer

William V. Custer, Georgia Bar No. 202910 Bryan Cave Leighton Paisner LLP One Atlantic Center, Fourteenth Floor 1201 West Peachtree Street, NW Atlanta, GA 30309-3488

Telephone: (404) 572-6600 Fax: (404) 572-6999

Email: bill.custer@bclplaw.com

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

GEORGIA STATE CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

v.

ROBYN A. CRITTENDEN, in her official capacity as Secretary of the State for the State of Georgia

Defendant.

AUSTIN THOMPSON, et al.,

Plaintiffs,

v.

ROBYN A. CRITTENDEN, in her official capacity as Secretary of the State for the State of Georgia

Defendant.

Civil Action No.

1:17-cv-01427-TCB-MLB-BBM

CONSOLIDATED

### [PROPOSED] ORDER

THIS MATTER having come before the Court on the Joint Stipulation and Consent Motion to Dismiss With Prejudice, submitted by all Plaintiffs and Defendant

Robyn A. Crittenden ("the Parties"), and upon consideration thereof and for good

cause shown,

IT IS HEREBY ORDERED that the Parties' Joint Stipulation and Consent

Motion to Dismiss With Prejudice is GRANTED. The Court orders that all claims

shall be dismissed, with prejudice, with each party to bear its own attorneys' fees,

expenses, and costs.

ENTERED this \_\_\_\_\_ day of January, 2019.

\_\_\_\_\_

Timothy C. Batten, Sr. United States District Judge