

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

NAACP, *et al.*,

*

*

Plaintiffs,

*

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

v.

*

*

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

*

CONSOLIDATED CASES

*

*

*

Defendant.

*

*

AUSTIN THOMPSON, *et al.*,

*

*

Plaintiffs,

*

*

v.

*

*

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

*

*

*

*

Defendant.

*

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

General Defenses

First Defense

Plaintiffs Cunningham, McKenzie, Orange, Snow, Arrey-Mbi, Anderson, and Jackson lack standing to challenge the drawing of either of HD 105 and HD 111.

Second Defense

HB 566 was not enacted with discriminatory intent.

Third Defense

HD 105 is not unconstitutionally racially gerrymandered.

Fourth Defense

HD 111 is not unconstitutionally racially gerrymandered.

Fifth 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.

Sixth Defense

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

Seventh 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.

Eighth Defense

Some or all of the relief sought by Plaintiffs Cunningham, McKenzie, Orange, Snow, Arrey-Mbi, Anderson, and Jackson is barred by the doctrine of laches because their claims were ripe on December 23, 2011, when Act No. 1EX was precleared.

Ninth Defense

Some or all of the relief sought by Plaintiffs Thompson and Payton is barred by the doctrine of laches because their claims were ripe on May 12, 2015, when H.B. 566 was signed by the Governor.

Specific Responses

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

1. The allegations of the first sentence of paragraph 1 do not require a response. Kemp denies the remaining allegations of paragraph 1.
2. Kemp denies the allegations of paragraph 2.
3. Kemp denies the allegations of paragraph 3.

4. For his response to the allegations of paragraph 4, with respect to the allegations that in the State of Georgia the majority of voters tend to vote Republican, and that that a majority of Georgia's African-American voters typically vote for Democratic candidates, Kemp is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies same. Kemp denies that Georgia has approximately 3.3 million African-American residents. According to the 2010 Census data Georgia has 3,054,098 African American residents (a combination of residents who are African American alone and who are African American plus at least one other race). *See <https://www.census.gov/prod/cen2010/briefs/c2010br-06.pdf> at Table 5.* Kemp admits that there are 62 Democrats in the Georgia House of Representatives, and that 47 of them are African-American. Kemp denies the remaining allegations of paragraph 4.
5. Kemp denies the allegations of paragraph 5.
6. Kemp denies the allegations of paragraph 6.
7. For his response to the allegations of paragraph 7, Kemp admits only that the General Assembly redrew the districts for the Georgia House of Representatives in 2011 and that H.B. 566 is based on the 2011 map. Kemp

is without knowledge or information sufficient to form a belief as to the truth of the allegation that H.B. 566 resulted in a Black Voting Age Population of nearly 70% in some districts and therefore denies same. Kemp denies the remaining allegations in paragraph 7.

8. For his response to the allegations of paragraph 8, Kemp admits only that the African-American candidates who ran as Democrats in House Districts 105 and 111 in the 2012 and 2014 general elections were defeated by white Republicans and denies the remaining allegations.
9. For his response to the allegations of paragraph 9, Kemp states that the Pew Research Center results speak for themselves and denies the remaining allegations of paragraph 9.
10. For his response to the allegations of paragraph 10, Kemp admits only that the General Assembly passed HB 566 in 2015 and that HB 566 included changes to House Districts 105 and 111. Kemp denies the remaining allegations of paragraph 10.
11. For his response to the allegations of paragraph 11, Kemp admits only that the African-American candidates who ran as Democrats in House Districts 105 and 111 in the 2016 general election were defeated by white Republicans and denies the remaining allegations.

12. For his response to the allegations of paragraph 12, Kemp admits only that H.B. 566 represented a “mid-cycle redistricting” and denies the remaining allegations
13. Kemp denies the allegations of paragraph 13.
14. For his response to the allegations of paragraph 14, Kemp admits only that the African-American population in certain parts of the state, most notably the Atlanta Metropolitan area, increased between the 2000 and 2010 Census. With respect to the allegation that the African-American population in certain parts of the state, most notably the Atlanta Metropolitan area, has significantly increased since 2010 Census, Kemp is without knowledge or information sufficient to form a belief as to the truth of the allegation and therefore denies same. Kemp denies the remaining allegations of paragraph 14.
15. Kemp denies the allegations of paragraph 15.
16. The allegations of paragraph 16 do not require a response.
17. The allegations of paragraph 17 do not require a response in that federal jurisdiction cannot be created by consent.
18. The allegations of paragraph 18 do not require a response in that federal jurisdiction cannot be created by consent.

19. Kemp does not object to the appointment of a three-judge court pursuant to 28 U.S.C. § 2284(a).
20. Kemp does not object to venue in this district and division.
21. For his response to the allegations of paragraph 21, Kemp admits only that Austin Thompson is an African-American citizen and lives within Georgia House District 105 in Gwinnett County. Kemp denies the remaining allegations of paragraph 21.
22. The allegations of paragraph 22 do not require a response because Wayne Swanson has voluntarily dismissed his claims.
23. For his response to the allegations of paragraph 23, Kemp admits only that Darryl Payton is an African-American citizen, that he lives within HD 111 in Henry County, and that he was defeated by a White opponent in the 2016 general election for House District 111. Kemp denies the remaining allegations of paragraph 23.
24. For his response to the allegations of paragraph 24, Kemp admits only that Audra Cunningham is an African-American citizen and lives within HD 59 in Fulton County. Kemp denies the remaining allegations of paragraph 24.

25. For his response to the allegations of paragraph 25, Kemp admits only that Sabrina McKenzie is an African-American citizen and lives within HD 88 in DeKalb County. Kemp denies the remaining allegations of paragraph 25.
26. For his response to the allegations of paragraph 26, Kemp admits only that Jamida Orange is an African-American citizen and lives within HD 57 in Fulton County. Kemp denies the remaining allegations of paragraph 26.
27. For his response to the allegations of paragraph 27, Kemp admits only that Andrea Snow is an African-American citizen and lives within HD 92 in Rockdale County. Kemp denies the remaining allegations of paragraph 27.
28. For his response to the allegations of paragraph 28, Kemp admits only that Sammy Arrey-Mbi is an African-American citizen and lives within HD 75 in Clayton County. Kemp denies the remaining allegations of paragraph 28.
29. For his response to the allegations of paragraph 29, Kemp admits only that Lynne Anderson is an African-American citizen and lives within HD 90 in Rockdale County. Kemp denies the remaining allegations of paragraph 29.
30. For his response to the allegations of paragraph 30, Kemp admits only that Coretta Jackson is an African-American citizen and lives within HD 61 in Fulton County. Kemp denies the remaining allegations of paragraph 30.

31. With respect to the allegations of paragraph 31, Kemp admits only that he is the chief election official of the State of Georgia and his duties are outlined in O.C.G.A. § 21-2-50. Kemp denies the remaining allegations of paragraph 31.
32. For his response to the allegations of paragraph 33, Kemp admits only that in the past, Georgia discriminated against African-Americans and implemented voting practices that hindered the ability of African-Americans to participate equally in the political process. Kemp denies the remaining allegations of paragraph 32.
33. For his response to the allegations of paragraph 33, Kemp admits only that African-Americans first voted in Georgia in 1868, that 25 elected African-American representatives and three senators were expelled from the General Assembly, and four mixed-race members were not. The General Assembly's resolution referred to in the third sentence of paragraph 33 speaks for itself. Kemp denies the remaining allegations of paragraph 33.
34. For his response to the allegations of paragraph 34, Kemp admits only that after 1868, the Georgia General Assembly took other steps to limit the voting rights of its African-American citizens and denies the remaining allegations.

35. For his response to the allegations of paragraph 35, Kemp admits only that Georgia enacted a poll tax in 1871, which was subsequently made permanent and cumulative, and that the poll tax was abolished in 1945. Kemp denies the remaining allegations of paragraph 35.
36. For his response to the allegations of paragraph 36, Kemp admits only that Georgia used methods other than the poll tax to limit voter participation. Kemp denies the remaining allegations of paragraph 36.
37. For his response to the allegations of paragraph 37, Kemp admits only that voter registration increased after the poll tax was abolished and that no African-Americans served in the General Assembly between 1908 and 1962. Kemp denies the remaining allegations of paragraph 37.
38. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 38 and therefore denies same.
39. For his response to the allegations of paragraph 39, Kemp admits only that Georgia became a covered jurisdiction under the Voting Rights Act in 1965. The holding of *Shelby v. Holder* speaks for itself. Kemp denies the remaining allegations of paragraph 39.
40. For his response to the allegations of paragraph 40, Kemp admits only that, during the time that Georgia was a covered jurisdiction under the Voting

Rights Act, it received more than 170 letters interposing objections to proposed changes in standards, practices, and procedures relating to voting.

Kemp denies the remaining allegations of paragraph 40.

41. For his response to the allegations of paragraph 41, Kemp states that the quoted cases speak for themselves and denies the remaining allegations.
42. For his response to the allegations of paragraph 42, Kemp admits only that some of Georgia's legislative plans have previously been invalidated by the courts. Kemp states that the decisions cited speak for themselves and denies the remaining allegations of paragraph 42.
43. For his response to the allegations of paragraph 43, Kemp admits only that, in the past, some political campaigns in Georgia made racial appeals. Kemp denies the remaining allegations of paragraph 43.
44. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 44 and therefore denies them.
45. For his response to the allegations of paragraph 45, Kemp admits only that, on his Facebook page, Gwinnett County Commissioner Tommy Hunter called Representative John Lewis a "racist pig." Kemp denies the remaining allegations of paragraph 45.

46. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 46 and denies them on that basis.
47. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 47 and denies them on that basis.
48. Kemp denies the allegations of paragraph 48.
49. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 49 and denies them on that basis.
50. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 50 and denies them on that basis.
51. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 51 and denies them on that basis.
52. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 52 and denies them on that basis.
53. For his response to paragraph 53, Kemp admits only that as of 2010, African-Americans made up approximately 31% of Georgia's population. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations of paragraph 53 and denies them on that basis.
54. Kemp admits the allegations of paragraph 54.

55. For his response to the allegations of paragraph 55, Kemp admits only that all of the African-Americans in the Georgia House of Representatives are Democrats, and that, in the past 50 years, only one African-American Republican has been elected to the House of Representatives. Kemp denies the remaining allegations of paragraph 55.
56. Kemp denies the allegations of paragraph 56.
57. For his response to the allegations of paragraph 57, Kemp admits only that, after receiving the results of the 2010 Census, Georgia enacted Act No. 1EX, which redrew the 180 districts in the House of Representatives. Kemp states that Art. III, section II of the Georgia Constitution of 1983 speaks for itself and denies the remaining allegations.
58. Kemp admits the allegations of paragraph 58.
59. Kemp admits the allegations of paragraph 59.
60. Kemp denies the allegations of the first sentence of paragraph 60. For his response to the remaining allegations of paragraph 60, Kemp admits only that the vote in the House on Act 277 was 101-53 and the vote in the Senate was 35-19. The results of those votes speak for themselves. Kemp denies the remaining allegations of paragraph 60.
61. Kemp admits the allegations of paragraph 61.

62. Kemp admits the allegations of paragraph 62.
63. For his response to the allegations of paragraph 63, Kemp admits only that, since the Supreme Court's decision in *Shelby County v. Holder* in 2013, Congress has not passed a new formula for identifying states that could become subject to the preclearance requirement of Section 5 of the Voting Rights Act. Kemp denies the remaining allegations of paragraph 63,
64. For his response to the allegations of paragraph 64, Kemp admits only that since 2013, the General Assembly has twice considered modifying the lines of legislative districts. Only one bill making such modifications was enacted. Kemp denies the remaining allegations of paragraph 64.
65. For his response to the allegations of paragraph 65, Kemp admits only that House Bill 566 was proposed soon after the 2014 state legislative elections and denies the remaining allegations.
66. For his response to the allegations of paragraph 66, Kemp admits only that HB 566 changed the lines of 17 districts in the House of Representatives and that district lines in only Chatham, Fulton, Gwinnett, Hall, Henry, Lowndes, Newton, and Spalding Counties were modified. Kemp denies the remaining allegations of paragraph 66.
67. Kemp admits the allegations of paragraph 67.

68. For his response to the allegations of paragraph 68, Kemp admits only that the House passed HB 566 on March 11, 2015 and that the Senate passed it on March 9, 2015. The votes in each house are a matter of public record. Kemp denies the remaining allegations of paragraph 68.
69. For his response to the allegations of paragraph 69, Kemp admits only that HB 566 was signed by the Governor in May 2015 and became effective immediately. Kemp denies the remaining allegations of paragraph 69.
70. For his response to the allegations of paragraph 70, Kemp admits only that the General Assembly considered making changes to some legislative districts in its 2017 session. Kemp states that no changes were made and denies the remaining allegations of paragraph 70.
71. For his response to the allegations of paragraph 71, Kemp is without knowledge or information sufficient to form a belief as to the truth of the allegations and therefore denies same.
72. Kemp denies the allegations of paragraph 72.
73. Kemp admits the allegations of paragraph 73.
74. For his response to the allegations of paragraph 74, Kemp admits only that under Act No. 277, 48.4% of the voting-age population of HD 105 was non-

Hispanic white, 32.4% non-Hispanic black, and 12.6% Hispanic. Kemp denies the remaining allegations of paragraph 74.

75. Kemp admits the allegations of paragraph 75.
76. For his response to the allegations of paragraph 76, Kemp admits only that, in the 2012 election for HD 105, Joyce Chandler, the white Republican incumbent, defeated Renita Hamilton, an African-American Democrat, by a margin of 51.3% to 48.7%, a difference of 554 votes. Kemp denies the remaining allegations of paragraph 76.
77. For his response to the allegations of paragraph 77, Kemp admits only that, in the 2014 election for HD 105, Chandler again defeated Hamilton, by a larger margin of 52.8% to 47.2%, a difference of 789 votes. Kemp denies the remaining allegations of paragraph 77.
78. For his response to the allegations of paragraph 78, Kemp admits only that under HB 566, the White voting-age population of HD 105 was 52.7% and the black voting-age population was 30.4% and that the White voting-age population increased by 4.3%, while the black voting-age population decreased by 2.0%. Kemp denies the remaining allegations of paragraph 78.
79. Kemp denies the allegations of paragraph 79.

80. For his response to the allegations of paragraph 80, Kemp admits only that HB 566 changed HD 105 by putting Precinct Lawrenceville M back together by moving the part of that precinct that had been in HD 105 out of it and that HB 566 moved all of Precinct Harbins C and part of Harbins A into HD 105. Kemp denies the remaining allegations of paragraph 80.
81. For his response to the allegations of paragraph 81, Kemp admits only that, in the 2016 general election, Chandler defeated Donna McLeod, an African-American Democrat. Kemp denies the remaining allegations of paragraph 81.
82. For his response to the allegations of paragraph 81, Kemp admits only that McLeod requested a recount. Kemp denies the remaining allegations of paragraph 82.
83. Kemp admits the allegations of paragraph 83.
84. Kemp denies the allegations of paragraph 84.
85. For his response to the allegations of paragraph 85, Kemp admits only that McLeod did not like the changes HB 566 made to HD 105 and denies the remaining allegations.
86. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 86 and therefore denies them.

87. For his response to the allegations of paragraph 87, Kemp admits only that HD 111 is located in Henry County, and that it was represented by Brian Strickland, a white Republican, until February 2018. Kemp denies the remaining allegations of paragraph 87.
88. For his response to the allegations of paragraph 88, Kemp admits only that under Act No. 277, the voting-age population of HD 111 was 56.1% white, 33.2% African-American, and 5.6% Hispanic. Kemp denies the remaining allegations of paragraph 88.
89. Kemp admits the allegations of paragraph 89.
90. Kemp admits the allegations of paragraph 90.
91. Kemp admits the allegations of paragraph 91.
92. For his response to the allegations of paragraph 92, Kemp admits that under HB 566, the voting-age population of HD 111 was 58.1% White and 31% African-American, and that the White voting-age population increased by 2%, while the black voting-age population decreased by 2.2%. Kemp denies the remaining allegations of paragraph 92.
93. For his response to the allegations of paragraph 93, Kemp admits that the precincts or partial precincts that H.B. 566 removed from HD 111 had the following voting age populations by race:

Stagecoach (entire precinct) - 27.85% black / 62.38% white;

Stockbridge West (entire precinct) - 58.65% black / 27.89% white;

McDonough Central (partial) - 36.21% black / 58.62% white;

Mount Carmel (partial) - 43.82% black / 40.97% white;

North Hampton (partial) – 28.17% black / 64.40% white.

Kemp also admits that the precincts or partial precincts that H.B. 566 added into HD111 had the following voting age populations by race:

Flippen (partial) - 38.34% black / 42.05% white;

Hickory Flat (partial) - 49.42% black / 33.55% white;

McDonough (entire precinct) - 43.96% black / 48.59% white;

McDonough Central (partial) - 18.18% black / 67.68% white;

Grove Park (entire precinct) - 20.87% black / 72.76% white;

Tussahaw (partial) – 4.56% black / 90.11% white.

Kemp denies the remaining allegations in paragraph 93.

94. Kemp denies the allegations of paragraph 94.

95. For his response to the allegations of paragraph 95, Kemp admits only that in the 2016 general election for HD 111, Representative Strickland defeated Darryl Payton, an African-American Democrat, by 51.69% to 48.31% of the

vote, a margin of 946 votes. Kemp denies the remaining allegations of paragraph 95.

96. Kemp denies the allegations of paragraph 96.
97. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 97 and therefore denies them.
98. For his response to the allegations of paragraph 98, Kemp admits only that HB 515 was introduced in February 2017. Kemp denies the remaining allegations of paragraph 98.
99. Kemp denies the allegations of paragraph 99.
100. For his response to the allegations of paragraph 100, Kemp admits only that in the 2014 and 2016 elections for HD 40, Rich Golick, a White Republican, defeated Erick Allen, an African-American Democrat, 60.1% to 39.9% in 2014 and 53.51% to 46.49% in 2016. Kemp denies the remaining allegations of paragraph 100.
101. For his response to the allegations of paragraph 101, Kemp admits only that the House passed HB 515 on a party-line vote on March 3, 2017. Kemp denies the remaining allegations of paragraph 101.
102. Kemp denies the allegations of paragraph 102.

103. For his response to the allegations of paragraph 103, Kemp admits only that HB 515 was tabled in the Senate and denies the remaining allegations.
104. Kemp denies the allegations of paragraph 104.
105. For his response to the allegations of paragraph 105, Kemp states that this paragraph consists of legal conclusions as to which no response is required. To the extent a response is required, Section 2 of the Voting Rights Act speaks for itself.
106. For his response to the allegations of paragraph 106, Kemp states that this paragraph consists of legal conclusions as to which no response is required, To the extent a response is required, *Thornburg v. Gingles*, 478 U.S. 30 (1986), speaks for itself.
107. For his response to the allegations of paragraph 107, Kemp states that this paragraph consists of legal conclusions as to which no response is required, To the extent a response is required, *Thornburg v. Gingles*, 478 U.S. 30 (1986), speaks for itself.
108. Kemp denies the allegations of paragraph 108.
109. Kemp denies the allegations of paragraph 109.
110. Kemp denies the allegations of paragraph 110.
111. Kemp denies the allegations of paragraph 111.

112. For his response to the allegations of paragraph 112, Kemp states that the results of the 2010 Census speak for themselves.
113. Kemp denies the allegations of paragraph 113.
114. Kemp denies the allegations of paragraph 114.
115. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 115 and therefore denies them.
116. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 116 and therefore denies them.
117. Kemp lacks knowledge or information sufficient to form a belief as to the truth of the allegations of paragraph 117 and therefore denies them.
118. For his response to the allegations of paragraph 118, Kemp admits only that a majority of the African-American Democrats in the House of Representatives has been elected from majority-minority districts and denies the remaining allegations.
119. No response is needed for paragraph 119.
120. For his response to the allegations of paragraph 120, Kemp states that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, 52 U.S.C. § 10301(a) speaks for itself.

121. For his response to the allegations of paragraph 121, Kemp admits that Plaintiffs have correctly quoted Section 1 of the Fourteenth Amendment to the Constitution of the United States.
122. For his response to the allegations of paragraph 122, Kemp states that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, the Fifteenth Amendment speaks for itself.
123. For his response to the allegations of paragraph 123, Kemp states that this paragraph consists of legal conclusions to which no response is required. To the extent a response is required, the cases cited speak for themselves.
124. Kemp denies the allegations of paragraph 124.
125. Kemp denies the allegations of paragraph 125.
126. Kemp denies the allegations of paragraph 126.
127. Kemp denies the allegations of paragraph 127 and further denies that Plaintiffs are entitled to the requested relief.
128. Kemp denies the allegations of paragraph 128 and further denies that Plaintiffs are entitled to the requested relief.
129. No response is needed for paragraph 129.

130. The allegations of paragraph 131 do not require a response. The Voting Rights Act speaks for itself.

131. Kemp denies the allegations of paragraph 131.

132. Kemp denies the allegations of paragraph 132.

133. Kemp denies the allegations of paragraph 133.

134. Kemp denies the allegations of paragraph 134.

135. Kemp denies the allegations of paragraph 135.

136. Kemp denies the allegations of paragraph 136.

137. No response is needed for paragraph 137.

138. For his response to the allegations of paragraph 138, Kemp admits that Plaintiffs have correctly quoted Section 1 of the Fourteenth Amendment to the Constitution of the United States.

139. Kemp denies the allegations of paragraph 139.

140. Kemp denies the allegations of paragraph 140.

141. Kemp denies the allegations of paragraph 141.

142. Kemp denies the allegations of paragraph 142.

143. Kemp denies the allegations of paragraph 143.

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

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

146. WHEREFORE, having answered Plaintiffs' First Amended Complaint and stated defenses and objections, Kemp 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 Kemp be granted such other relief as this Court may deem just and proper.

This 9th day of March, 2018.

CHRISTOPHER M. CARR
Attorney General 112505

ANNETTE M. COWART 191199
Deputy Attorney General

RUSSELL D. WILLARD 760280
Senior Assistant Attorney General

CRISTINA CORREIA 188620
Senior Assistant Attorney General
40 Capitol Square SW
Atlanta, GA 30334
ccorreia@law.ga.gov
404-656-7063
404-651-9325

/s/ Frank B. Strickland
Frank B. Strickland
Special Assistant Attorney General
Georgia Bar No. 687600
fbs@sblaw.net

John J. Park Jr.
Georgia Bar No. 547812
jjp@sblaw.net
Barclay S. Hendrix
Georgia Bar No. 917852
Barclay.hendrix@sblaw.com
STRICKLAND BROCKINGTON
LEWIS LLP
Midtown Proscenium Suite 2200
1170 Peachtree Street NE
Atlanta, Georgia 30309
678-347-2200 (telephone)
678-347-2210 (facsimile)

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**

NAACP, <i>et al.</i> ,	*	
	*	
Plaintiffs,	*	
	*	Case No. 1:17-cv-01427-
v.	*	TCB-WSD-BBM
	*	
BRIAN KEMP, in his official capacity as Secretary of State for the State of Georgia,	*	CONSOLIDATED CASES
	*	
	*	
Defendant.	*	
<hr style="width: 50%; margin-left: 0;"/>		
AUSTIN THOMPSON, <i>et al.</i> ,	*	
	*	
Plaintiffs,	*	
	*	
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 DEFENDANT’S ANSWER TO THOMPSON PLAINTIFFS’ 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 9th day of March, 2018.

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