

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

NAACP, et al.,)
)
Plaintiffs,)
)
v.)
)
BRIAN KEMP, in his official as)
Secretary of State for Georgia,)
)
Defendant.)

Case # 1:17-cv-01427-
TCB-WSD-BBM

CONSOLIDATED CASES

AUSTIN THOMPSON, et al.,)
)
Plaintiffs)
)
v.)
)
BRIAN KEMP, in his official as)
Secretary of State for Georgia,)
)
Defendant)

**MOTION FOR LEAVE TO SUBMIT
AMICUS CURIAE BRIEF IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

The following organizations move this Court for leave to file the attached
Amicus Curiae Brief in Support of Plaintiff's Motion for Preliminary
Injunction:

1. Alliance for Better Georgia;

2. Better Georgia and;
3. Fair District GA.

In this brief we provide background information about (a) the legislative process culminating in the enactment of HB 566 which is under constitutional challenge and (b) the legislative process in HB 515, a similar bill proposed in the Georgia General Assembly two years later. Our purpose is to add insight into the issue of impermissible racial motivation which was behind both bills.

In addition, we argue that mid-decade redistricting should be barred in the circumstances of this case where the **sole** purpose behind the district boundary changes was to increase the probability that an incumbent would win reelection. The Georgia General Assembly did not consider or give any weight to the constitutional protected interest of the citizenry in the affected districts to retain the existing district boundary lines as they were drawn following the 2010 census.

1. Alliance for Better Georgia is a 501(c)(3) nonprofit organization that works to promote community involvement across Georgia. Among our educational goals is increasing the effective participation of minorities in voting and more generally to promote racial justice. Bryan Long is the current Executive Director. Albert M. Pearson is Chair of the Board for Alliance for

Better Georgia. The business address is: P.O. Box 1982, Athens, Georgia 30603. Website -- <http://allianceforabettergeorgia.org/>

2. Better Georgia is a 501(c)(4) organization dedicated to advocacy on a wide range of public issues, including redistricting and fair elections. Bryan Long is the current Executive Director. Amy Morton is Chair of the Board for Better Georgia. The business address is: P.O. Box 1982, Athens, Georgia 30603. Website -- <http://bettergeorgia.org/>. Facebook page -- <https://www.facebook.com/bettergeorgia/>.

3. Fair District GA is a 501(c)(4) a non-partisan organization whose focus is to fight gerrymandering by reforming the redistricting system in Georgia. It collaborates with a variety of advocacy and grassroots organizations to inform Georgians about the dangers of gerrymandering, to advocate for redistricting reform legislation, and to engage concerned citizens in this cause. Patricia Byrd is Chair of the Board. Website – (under construction). Facebook page --

<https://www.facebook.com/groups/252014951933842/?ref=bookmarks>.

Twitter -- @FairDistrictGA.

Respectfully submitted, this April 23, 2018.

/s/Albert M. Pearson, III
Albert M. Pearson, III
Georgia Bar No. 569275

Albert M. Pearson, LLC
Box 162
2897 North Druid Hills Road, NE
Atlanta, GA 30329
404-281-4087
amp1859law@gmail.com

Attorney for Amici Curiae

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing document was prepared using Times New Roman, 14-point, and otherwise conforms to the requirements of Local Rule 5.1.

/s/Albert M. Pearson, III
Albert M. Pearson, III
Georgia Bar No. 569275

Attorney for Amici Curiae

CERTIFICATE OF SERVICE

I certify that on April 23, 2018, the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record in this action.

/s/Albert M. Pearson, III
Albert M. Pearson, III
Georgia Bar No. 569275

Attorney for Amici Curiae