

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

Martin Cowen, et al.,

Plaintiffs,

vs.

Brad Raffensperger, in his
official capacity as Secretary of
State of the State of Georgia,

Defendant.

Case No. 1:17-cv-04660-LMM

**Plaintiffs' Motion for
Summary Judgment**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, the plaintiffs respectfully move the Court for summary judgment on their claims that Georgia's ballot-access restrictions violate rights guaranteed to them by the First and Fourteenth Amendments and the Equal Protection Clause of the Fourteenth Amendment. The plaintiffs seek declaratory and injunctive relief prohibiting the defendant from enforcing those restrictions to the extent that they violate the Constitution.

If the Court does not grant all the relief requested by this motion, the plaintiffs further move the Court to enter an order setting forth the material facts that are not in dispute and treating those facts as established in the case for purposes of trial. Fed. R. Civ. P. 56(g).

A brief, supporting documents, and a statement of undisputed materials facts are attached.

Respectfully submitted this 5th day of June, 2019.

/s/ Bryan L. Sells

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CERTIFICATE OF COMPLIANCE

I hereby certify that the forgoing PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT was prepared in 13-point Century Schoolbook in compliance with Local Rules 5.1(C) and 7.1(D).

/s/ Bryan L. Sells

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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2019, I electronically filed the foregoing PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Cristina Correia: ccorreia@law.ga.gov

/s/ Bryan L. Sells

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