

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION**

FAIR FIGHT, INC., *et al.*,

Plaintiffs,

v.

TRUE THE VOTE, *et al.*,

Defendants,

FAIR FIGHT ACTION, INC.,

Counter-Defendant.

**Case No. 2:20-CV-00302-SCJ**

**CONSENT MOTION FOR LEAVE TO FILE  
FIRST AMENDED COMPLAINT**

Plaintiffs move this Court for an order pursuant to Federal Rule of Civil Procedure 15 for leave to file a First Amended Complaint. Rule 15(a)(2) provides that, after a responsive pleading is filed, as here, subsequent amendments to a party's pleadings may be made "with the opposing party's written consent or the court's leave." Counsel for Plaintiffs have conferred with counsel for Defendants in advance of filing the present motion, and Defendants have provided written consent to the proposed amendment.

A proposed First Amended Complaint is attached hereto as Exhibit A. Plaintiffs propose to amend the Complaint to add Scott Berson and Jocelyn Heredia

as plaintiffs; to remove John Doe as a plaintiff; and to make minor updates to the Complaint to reflect that the January 5, 2021 runoff election has now taken place. Plaintiffs request that the Court grant their Consent Motion for Leave to File First Amended Complaint, and that the proposed First Amended Complaint be deemed filed and served as of the date of this motion.

Dated this 10th day of March 2021.

Respectfully Submitted,

/s/ Uzoma N. Nkwonta

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2021, I electronically filed this Consent Motion for Leave to File First Amended Complaint through this Court's CM/ECF system.

Dated: March 10, 2021

/s/ Uzoma N. Nkwonta

Uzoma N. Nkwonta