

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

GEORGIA REPUBLICAN PARTY,)	
INC, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION NO.
)	1:20-cv-5018-ELR
v.)	
)	
BRAD RAFFENSPERGER, <i>et al.</i> ,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS

Defendants Secretary of State Brad Raffensperger and State Election Board members Rebecca N. Sullivan, David J. Worley, Matthew Mashburn, and Ahn Le (collectively, "Defendants") hereby move to dismiss Plaintiffs' Complaint for pursuant to FED. R. CIV. P. 12(b)(1) and (6) for lack of subject matter jurisdiction and various other threshold defenses stated in the accompanying brief in support. The Defendants also move that the Court deny any injunctive and other relief sought in the Plaintiffs' Complaint. Defendants respectfully request that the Court grant their motion and dismiss the action with prejudice. A brief in support of this motion is being filed simultaneously.

Respectfully submitted, this 16th day of December, 2020.

Christopher M. Carr	112505
Attorney General	
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/s/ Charlene S. McGowan
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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing has been formatted using Times New Roman font in 14-point type in compliance with Local Rule 7.1(D).

/s/ Charlene S. McGowan
Charlene S. McGowan
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **DEFENDANTS' MOTION TO DISMISS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for all parties of record via electronic notification.

Dated: December 16, 2020.

/s/ Charlene S. McGowan
Charlene S. McGowan
Assistant Attorney General