

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

**CITY OF STOCKBRIDGE, )  
GEORGIA; ELTON ALEXANDER; )  
JOHN BLOUNT; and URBAN )  
REDEVELOPMENT AGENCY OF )  
THE CITY OF STOCKBRIDGE, )**

**Plaintiffs,**

**v.**

**TINA LUNSFORD, in Her )  
Individual and Official Capacities as )  
the Henry County Elections and )  
Registration Director; ANDY )  
CALLAWAY, JON )  
KIRKPATRICK, MILDRED )  
SCHMELZ, DAN RICHARDSON, )  
and ARCH BROWN, in Their )  
Individual and Official Capacities as )  
Members of the Henry County Board )  
of Elections and Registration, )**

**Defendants.**

**CIVIL ACTION NO.  
1:18-CV-3961-LMM**

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs the City of Stockbridge, Georgia (“Stockbridge”), the Urban Redevelopment Agency of the City of Stockbridge (“Stockbridge URA”), Elton Alexander, and John Blount (Plaintiffs Alexander and Blount are referred to herein together as the “Voter Plaintiffs”) by and through undersigned counsel hereby

move the Court for a preliminary injunction for the reasons more fully set forth in their Memorandum of Law in Support of this Motion filed herewith. In particular, Plaintiffs ask this Court to enjoin the November 6, 2018 referendum scheduled pursuant to Act 548 of the 2018 Session of the Georgia General Assembly (“Act 548”) that would enable Act 548 and Act 559 of the 2018 Session of the Georgia General Assembly (“Act 559”) and to enjoin Defendants from taking any action to administer or implement Act 558 and Act 559 until a trial may be held on the merits of this case.

Respectfully submitted this 13th day of September, 2018.

/s/ Christopher S. Anulewicz

Michael J. Bowers

Georgia Bar No. 71650

Christopher S. Anulewicz

Georgia Bar No. 020914

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been filed with the Court using the CM/ECF system which will automatically send e-mail notifications of such filings to the all attorneys of record on this 13th day of September, 2018.

/s/ Christopher S. Anulewicz

Christopher S. Anulewicz

Georgia Bar No. 020914