

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

**COMMON CAUSE and  
GEORGIA STATE CONFERENCE  
OF THE NAACP,**

**Plaintiffs,**

**v.**

**BRIAN KEMP, individually and in  
his official capacity as Secretary of  
State of the State of Georgia,**

**Defendant.**

---

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**Civil Action No.  
1:16CV00452-TCB**

**DEFENDANT KEMP’S BRIEF IN SUPPORT OF  
MOTION TO DISMISS**

COMES NOW BRIAN KEMP, Georgia Secretary of State, by and through his attorney of record, the Attorney General of the State of Georgia, and files this Motion to Dismiss pursuant to Fed. R. Civ. Proc. 12(b)(6).

The basis for the motion is more fully set forth in the accompanying Brief in Support of Motion to Dismiss.

Respectfully submitted,

SAMUEL S. OLENS            551540  
Attorney General

DENNIS R. DUNN            234098  
Deputy Attorney General

RUSSELL D. WILLARD    760280  
Senior Assistant Attorney General  
rwillard@law.ga.gov

/s/Julia B. Anderson  
JULIA B. ANDERSON       017560  
Senior Assistant Attorney General  
janderson@law.ga.gov

/s/Cristina Correia  
CRISTINA CORREIA       188620  
Assistant Attorney General  
ccorreia@law.ga.gov

/s/Josiah Heidt  
JOSIAH HEIDT            104183  
Assistant Attorney General  
jheidt@law.ga.gov

Please address all  
Communication to:  
CRISTINA CORREIA  
Assistant Attorney General  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334-1300  
(404) 656-7063  
Fax: 404-651-9325

### **Certificate of Service**

I hereby certify that on March 4, 2016, I electronically filed Defendant Brian Kemp's Motion to Dismiss using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Emmet J. Bondurant, II  
Jason J. Carter  
Chad Lennon  
Bondurant Mixson & Elmore, LLP  
1201 West Peachtree Street, N.W.  
3900 One Atlantic Center  
Atlanta , GA 30309-3417

I hereby certify that I have mailed by United States Postal Service the document to the following non-CM/ECF participants: NONE

This 4<sup>th</sup> day of March, 2016.

/s/Cristina Correia  
Cristina Correia 188620  
Assistant Attorney General