

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

**GEORGIA COALITION FOR THE  
PEOPLES’ AGENDA, as an  
Organization; GEORGIA STATE  
CONFERENCE OF THE NAACP,  
as an organization; and THIRD  
SECTOR DEVELOPMENT, INC.  
as an organization;**

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

**CIVIL ACTION FILE**

**NO. 4:16-CV-0269-WTM-GRS**

**Plaintiffs,**

**v.**

**JOHN NATHAN DEAL, in his official  
Capacity as Governor of Georgia, and  
BRIAN P. KEMP, in his official  
Capacity as Secretary of State for the  
State of Georgia,**

**Defendants.**

**Joint Stipulation**

Come Now the Parties and hereby file this Joint Stipulation.

1. The Parties agree that due to the Court awarding remedial relief requested by Plaintiffs on their motion for a preliminary injunction, Defendants’ compliance with the Court’s Order, and the passage of time, all substantive issues on the merits of Plaintiffs’ claims, except as to any entitlement to attorneys’ fees, are now moot.

2. The Parties agree further that filing an Answer or Motion to Dismiss for Lack of Subject Matter Jurisdiction by Defendant at this stage of the proceedings would waste both the Parties' and this Court's resources and therefore Plaintiffs waive any requirement that Defendants file such a response.
3. The Parties agree further to a briefing schedule on the issue of Plaintiffs' entitlement to attorneys' fees and costs as follows:
  - a. Plaintiffs will file a motion for attorneys' fees and costs, and accompanying brief, on or before February 24, 2017;
  - b. Defendant will file a response brief within fourteen (14) days of Plaintiffs' filing;
  - c. Plaintiff will have seven (7) days from the date of Defendant's response brief to file a reply.
4. Finally, the parties agree to continue efforts to try and resolve this matter in its entirety.

Respectfully submitted,

CHRISTOPHER M. CARR      112505  
Attorney General

ANNETTE M. COWART      191199  
Deputy Attorney General

RUSSELL D. WILLARD      760280  
Senior Assistant Attorney General

JULIA B. ANDERSON 017560  
Senior Assistant Attorney General

/s/Cristina M. Correia  
CRISTINA M. CORREIA 188620  
Assistant Attorney General

JOSIAH B. HEIDT 104183  
Assistant Attorney General  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334-1300  
(404)656-3389  
FAX (404) 657-9932  
jheidt@law.ga.gov

Attorneys for Defendants

/s/Julie M. Houk  
EZRA D. ROSENBURG  
JULIE M. HOUK  
JOHN POWERS  
Lawyers' Committee for Civil Rights Under Law  
1401 New York Avenue, NW Suite 400  
Washington, DC 20005  
(202)662-8600  
FAX: (202) 783-0857

WILLIAM V. CUSTER 202910  
Bryan Cave, LLP  
One Atlantic Center  
14<sup>th</sup> Floor  
1201 W. Peachtree St., NW  
Atlanta, GA 30309-3488  
(404) 572-6600  
FAX: (202) 572-6999

Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day electronically filed the within and foregoing **JOINT STIPULATION** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties to this matter via electronic notification or otherwise:

Ezra D. Rosenberg  
John Powers  
Julie M. Houk  
Lawyers' Committee for Civil Rights Under Law  
1401 New York Avenue, NW Suite 400  
Washington, DC 20005

William V. Custer  
Bryan Cave, LLP  
One Atlantic Center 1201 W. Peachtree St., NW  
14th Floor  
Atlanta, GA 30309-3488

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

This 11th day of January, 2017.

/s/Cristina Correia

CRISTINA M. CORREIA                      188620  
Assistant Attorney General