

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

KAREN FINN, DR. JILLIAN FORD,  
HYLAH DALY, JENNE DULCIO,  
GALEO LATINO COMMUNITY  
DEVELOPMENT FUND, INC., NEW  
GEORGIA PROJECT ACTION FUND,  
LEAGUE OF WOMEN VOTERS OF  
MARIETTA-COBB, AND GEORGIA  
COALITION FOR THE PEOPLE'S  
AGENDA, INC.

Plaintiffs,

VS.

COBB COUNTY BOARD OF  
ELECTIONS AND REGISTRATION AND  
JANINE EVELER, in her official capacity  
as Director of the Cobb County Board of  
Elections and Registration,

Defendants.

Case No.

1:22-cv-2300-ELR

**PLAINTIFFS' RESPONSE TO COBB COUNTY SCHOOL DISTRICT'S  
MOTION TO INTERVENE**

Plaintiffs Karen Finn, Dr. Jillian Ford, Hylah Daly, Jenne Dulcio, GALEO Latino Community Fund, Inc., New Georgia Project Action Fund, League of Women Voters of Marietta-Cobb, and Georgia Coalition for the People's Agenda,

Inc. (“Plaintiffs”), write in response to the Cobb County School District’s (“School District”) Motion to Intervene filed on December 19, 2022. Dkt. 52. Plaintiffs consent to intervention by the School District, with the understanding by the proposed-intervenors<sup>1</sup> that the discovery period has commenced.<sup>2</sup>

---

<sup>1</sup> The School District’s Motion relies on the understanding that discovery is open, with a concluding date of June 9, 2023. Br. at 12. Plaintiffs agree with this understanding and continue to maintain that a full eight (8)-month discovery period is warranted by the needs of this case, and continue to seek an order from the Court resetting the discovery window accordingly. *See* Dkt. 51-1 at 3–4.

<sup>2</sup> Plaintiffs are eager to move this case forward towards a timely resolution. Thus, despite an unexcused 6-month delay by the School District in moving to intervene, and a filing rife with baseless personal attacks and distortions of Plaintiffs’ claims, Plaintiffs are consenting to intervention to conserve judicial resources and ensure that any relief obtained by Plaintiffs can be implemented before the 2024 election cycle.

Dated this 30<sup>th</sup> day of  
December 2022.

Respectfully submitted,

/s/ Pichaya Poy Winichakul

Bradley E. Heard (Ga. Bar No. 342209)  
Pichaya Poy Winichakul (Ga. Bar No. 246858)  
Michael Tafelski (Ga. Bar No. 507007)  
Sabrina Khan\*  
SOUTHERN POVERTY LAW CENTER  
150 E. Ponce de Leon Ave., Suite 340  
Decatur, Georgia 30030  
(404) 521-6700  
bradley.heard@splcenter.org  
poy.winichakul@splcenter.org  
michael.tafelski@splcenter.org  
sabrina.khan@splcenter.org

Jeff Loperfido\*  
Christopher Shenton\*  
SOUTHERN COALITION FOR SOCIAL  
JUSTICE  
1415 West Highway 54, Suite 101  
Durham, NC 27707  
(919) 323-3380  
jeffloperfido@scsj.org  
chrissenton@scsj.org

Rahul Garabadu (Ga. Bar No. 553777)  
Cory Isaacson (Ga. Bar No. 983797)  
Caitlin May (Ga. Bar No. 602081)  
ACLU FOUNDATION OF GEORGIA, INC.  
P.O. Box 570738

Atlanta, Georgia 30357  
(678) 310-3699  
rgarabadu@acluga.org  
cisaacson@acluga.org  
cmay@acluga.org

Jon Greenbaum\*  
Ezra D. Rosenberg\*  
Julie M. Houk\*  
Sofia Fernandez Gold\*†  
LAWYERS' COMMITTEE FOR  
CIVIL RIGHTS UNDER LAW  
1500 K Street, Suite 900  
Washington, DC 20005  
(202) 662-8600  
jgreenbaum@lawyerscommittee.org  
erosenberg@lawyerscommittee.org  
jhouk@lawyerscommittee.org  
sfgold@lawyerscommittee.org

Douglas I. Koff\*  
Thomas L. Mott\*  
Paul Schochet\*  
Savannah Price\*  
SCHULTE ROTH & ZABEL LLP  
919 Third Avenue  
New York, New York 10022  
(212) 756-2000  
Douglas.Koff@srz.com  
Thomas.Mott@srz.com  
Paul.Schochet@srz.com  
Savannah.Price@srz.com

\* Admitted Pro Hac Vice

† Admitted in New York only. Practice limited to matters before federal courts.

*Counsel for Plaintiffs Karen Finn, Dr. Jillian Ford, Hylah Daly, Jenne Dulcio, GALEO Latino Community Development Fund, Inc., New Georgia Project Action Fund, League of Women Voters of Marietta-Cobb, and Georgia Coalition For The People's Agenda, Inc.*

/s/ Caren E. Short

Caren E. Short (Ga Bar No. 990443)

LEAGUE OF WOMEN VOTERS

OF THE UNITED STATES

1233 20th Street NW, Suite 500

Washington, DC 20036

202-921-2219

cshort@lwv.org

*Counsel for Plaintiff League of Women Voters  
Marietta-Cobb*

### **CERTIFICATE OF COMPLIANCE**

The undersigned counsel hereby certifies that this brief complies with L.R. 5.1B and 7.1 and that this brief is published in 14-point Times New Roman font.

/s/ Pichaya Poy Winichakul

Pichaya Poy Winichakul (Ga. Bar  
No. 246858)  
SOUTHERN POVERTY LAW CENTER  
150 E. Ponce de Leon Ave.,  
Decatur, Georgia 30030  
(404) 521-6700  
poy.winichakul@splcenter.org

**CERTIFICATE OF SERVICE**

I hereby certify that on December 30, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

/s/ Pichaya Poy Winichakul

Pichaya Poy Winichakul (Ga. Bar  
No. 246858)  
SOUTHERN POVERTY LAW CENTER  
150 E. Ponce de Leon Ave.,  
Decatur, Georgia 30030  
(404) 521-6700  
poy.winichakul@splcenter.org