

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

GEORGIA STATE CONFERENCE OF
THE NAACP, *et al.*,

Plaintiffs,

v.

STATE OF GEORGIA, *et al.*,

Defendants.

CIVIL ACTION FILE

NO. 1:21-CV-5338-ELB-SCJ-SDG

THREE-JUDGE COURT

**DEFENDANTS' ANSWER TO PLAINTIFFS' AMENDED COMPLAINT
FOR DECLARATORY AND INJUNCTIVE RELIEF**

Defendants the State of Georgia; Brian Kemp, in his official capacity as the Governor of the State of Georgia; Brad Raffensperger, in his official capacity as Secretary of the State of Georgia (together, “Defendants”), answer Plaintiffs’ Amended Complaint [Doc. 59] (the “Amended Complaint”) as follows:

FIRST AFFIRMATIVE DEFENSE

The allegations in Plaintiffs’ Amended Complaint fail to state a claim upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred for failure to name necessary and indispensable parties.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs lack constitutional standing to bring this action.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs lack statutory standing to bring this action.

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' federal claims against Defendant are barred by the Eleventh Amendment to the United States Constitution.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by sovereign immunity.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred because Section 2 of the Voting Rights Act provides no private right of action.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred because their proposed remedies require unconstitutional racial gerrymandering.

NINTH AFFIRMATIVE DEFENSE

Defendants deny that Plaintiffs have been subjected to the deprivation of any right, privilege, or immunity under the Constitution or laws of the United States.

TENTH AFFIRMATIVE DEFENSE

Defendants reserve the right to amend their defenses and to add additional ones, including lack of subject matter jurisdiction based on the mootness or ripeness doctrines, as further information becomes available in discovery.

INTRODUCTION

Defendants deny any allegations contained in the introduction of Plaintiffs' Amended Complaint because the Introduction section fails to comply with Fed. R. Civ. P. 8(d)(1). Defendants further deny the allegations set forth in the Introduction of the Amended Complaint because they contain legal conclusions to which no response is required.

BACKGROUND

Defendants answer the specific numbered paragraphs of Plaintiffs' Amended Complaint as follows:

1. Defendants admit that the 2020 Census showed significant population growth in the State of Georgia in the past decade. Defendants

further state that the Census results speak for themselves. The remaining allegations in Paragraph 1 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

2. Defendants state that the 2020 Census results speak for themselves. The remaining allegations in Paragraph 2 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

3. Defendants admit that Georgia's population is becoming more racially and ethnically diverse and admit that the Georgia General Assembly created maps for Georgia's House, Senate, and Congressional districts that were signed by Governor Kemp. Defendants deny the remaining allegations set forth in Paragraph 3 of the Amended Complaint.

4. Defendants deny the allegations set forth in Paragraph 4 of the Amended Complaint.

5. Defendants deny the allegations set forth in Paragraph 5 of the Amended Complaint.

6. Defendants deny the allegations set forth in Paragraph 6 of the Amended Complaint.

7. Defendants deny the allegations set forth in Paragraph 7 of the Amended Complaint.

8. The allegations set forth in Paragraph 8 are legal conclusions to which no response is required, and Defendants therefore deny the same on that basis. Defendants lack knowledge as to the remaining allegations set forth in Paragraph 8 of the Amended Complaint and Defendants therefore deny the same on that basis.

9. Defendants admit that maps drawn by Democratic majorities in the Georgia General Assembly have previously been invalidated by the courts. The remaining allegations set forth in Paragraph 9 are legal conclusions to which no response is required, and Defendants therefore deny the same on that basis. Defendants deny the remaining allegations set forth in Paragraph 9 of the Amended Complaint.

10. The allegations set forth in Paragraph 10 are legal conclusions to which no response is required, and Defendants therefore deny the same on that basis. Defendants lack knowledge as to the remaining allegations set forth in Paragraph 10 of the Amended Complaint and Defendants therefore deny the same on that basis.

11. The allegations set forth in Paragraph 11 are legal conclusions to which no response is required, and Defendants therefore deny the same on that basis. Defendants deny the remaining allegations set forth in Paragraph 11 of the Amended Complaint.

12. The allegations set forth in Paragraph 12 are legal conclusions to which no response is required, and Defendants therefore deny the same on that basis. Defendants lack knowledge as to the remaining allegations set forth in Paragraph 12 of the Amended Complaint and Defendants therefore deny the same on that basis.

13. The allegations set forth in Paragraph 13 are legal conclusions to which no response is required, and Defendants therefore deny the same on that basis. Defendants deny the remaining allegations set forth in Paragraph 13.

14. Defendants deny the allegations set forth in Paragraph 14 of the Amended Complaint.

15. Defendants deny the allegations set forth in Paragraph 15 of the Amended Complaint.

16. Defendants deny the allegations set forth in Paragraph 16 of the Amended Complaint.

17. Defendants deny the allegations set forth in Paragraph 17 of the Amended Complaint.

18. Defendants admit that the Georgia General Assembly enacted SB 202 in the 2021 legislative session and further states that Georgia saw record

voter turnout in its wake. Defendants deny the remaining allegations set forth in Paragraph 18 of the Amended Complaint.

19. The text of SB 202 speaks for itself and Defendants deny the Plaintiffs' editorializing about its provisions in Paragraph 19 of the Amended Complaint because they are legal conclusions to which no response is required. Defendants admit that Sen. Warnock and Sen. Ossoff are the first Black and Jewish senators, respectively, elected in Georgia. The article cited in Paragraph 19 of the Plaintiffs' Amended Complaint speaks for itself, and no response is required. Defendants deny the remaining allegations set forth in Paragraph 19 of the Amended Complaint.

20. The text of SB 202 speaks for itself and Defendants deny any of Plaintiffs' editorializing about its provisions in Paragraph 20 of the Amended Complaint because they are legal conclusions to which no response is required. Defendants deny the remaining allegations set forth in Paragraph 20 of the Amended Complaint.

21. The article cited in Paragraph 21 of the Amended Complaint speaks for itself. The remaining allegations set forth in Paragraph 21 of the Amended Complaint are outside Defendants' knowledge and are denied on that basis.

22. The text of SB 202 speaks for itself and Defendants deny any of Plaintiffs' editorializing about its provisions in Paragraph 22 of the Amended Complaint because they are legal conclusions to which no response is required. Defendants deny the remaining allegations set forth in Paragraph 22 of the Amended Complaint.

23. The text of SB 202 speaks for itself and Defendants deny any of Plaintiffs' editorializing about its provisions in Paragraph 23 of the Amended Complaint because they are legal conclusions to which no response is required. Defendants deny the remaining allegations set forth in Paragraph 23 of the Amended Complaint.

24. Defendants deny the allegations set forth in Paragraph 24 of the Amended Complaint.

25. Defendants deny the allegations set forth in Paragraph 25 of the Amended Complaint.

26. The allegations set forth in Paragraph 26 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 26 of the Amended Complaint.

27. The allegations set forth in Paragraph 27 of the Amended Complaint contain legal conclusions to which no response is required and are

denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 27 of the Amended Complaint.

28. Defendants deny the allegations set forth in Paragraph 28 of the Amended Complaint.

29. The allegations set forth in Paragraph 29 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis. Defendants deny the remaining allegations in Paragraph 29 of the Amended Complaint and deny that Plaintiffs are entitled to any relief.

30. Defendants deny the allegations in Paragraph 30 of the Amended Complaint and deny that Plaintiffs are entitled to any relief.

31. Defendants deny the allegations in Paragraph 31 of the Amended Complaint and deny that Plaintiffs are entitled to any relief.

32. Defendants admit that this action requires the convening of a three-judge panel pursuant to 28 U.S.C. § 2284.

33. The allegations set forth in Paragraph 33 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

34. The allegations set forth in Paragraph 34 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

35. The allegations set forth in Paragraph 35 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

36. The allegations set forth in Paragraph 36 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

37. The allegations set forth in Paragraph 37 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

38. The allegations set forth in Paragraph 38 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

39. The allegations set forth in Paragraph 39 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

40. The allegations set forth in Paragraph 40 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

41. The allegations set forth in Paragraph 41 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

42. The allegations set forth in Paragraph 42 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis. The remaining allegations in Paragraph 42 are outside the knowledge of Defendants and are therefore denied on that basis.

43. The allegations set forth in Paragraph 43 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

44. The allegations set forth in Paragraph 44 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

45. The allegations set forth in Paragraph 45 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

46. The allegations set forth in Paragraph 46 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

47. The allegations set forth in Paragraph 47 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

48. The allegations set forth in Paragraph 48 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

49. The allegations set forth in Paragraph 49 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

50. The allegations set forth in Paragraph 50 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

51. The allegations set forth in Paragraph 51 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis. The remaining allegations in Paragraph 51 are outside the knowledge of Defendants and are therefore denied on that basis.

52. The allegations set forth in Paragraph 52 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis. The remaining allegations in Paragraph 52 are outside the knowledge of Defendants and are therefore denied on that basis.

53. The allegations set forth in Paragraph 53 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

54. The allegations set forth in Paragraph 54 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

55. The allegations set forth in Paragraph 55 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

56. The allegations set forth in Paragraph 56 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

57. The allegations set forth in Paragraph 57 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

58. The allegations set forth in Paragraph 58 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis. The remaining allegations in Paragraph 58 are outside the knowledge of Defendants and are therefore denied on that basis.

59. The allegations set forth in Paragraph 59 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis. The remaining allegations in Paragraph 59 are outside the knowledge of Defendants and are therefore denied on that basis.

60. Defendants admit the allegations set forth in Paragraph 60 of the Amended Complaint.

61. Defendants admit the allegations set forth in Paragraph 61 of the Amended Complaint.

62. Defendants admit that Brad Raffensperger is the Secretary of State of Georgia and that the Secretary of State is designated by statute as the chief election officer. Defendants further admit that the Secretary of State has responsibilities under law related to elections. Defendants deny the remaining allegations set forth in Paragraph 62 of the Amended Complaint.

63. The statutory provisions cited in Paragraph 63 of the Amended Complaint speak for themselves and contain legal conclusions to which no

response is required and are denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 63 of the Amended Complaint.

64. The statutory provisions and caselaw cited in Paragraph 64 of the Amended Complaint speak for themselves and contain legal conclusions to which no response is required and are denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 64 of the Amended Complaint.

65. The statutory provisions and caselaw cited in Paragraph 65 of the Amended Complaint speak for themselves and contain legal conclusions to which no response is required and are denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 65 of the Amended Complaint.

66. The allegations set forth in Paragraph 66 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis.

67. The Senate Report cited in Paragraph 67 of the Amended Complaint speaks for itself and contains legal conclusions to which no response is required and are denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 67 of the Amended Complaint.

68. The allegations set forth in Paragraph 68 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis.

69. The caselaw cited in Paragraph 69 of the Amended Complaint speaks for itself and contains legal conclusions to which no response is required and are denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 69 of the Amended Complaint.

70. The caselaw cited in Paragraph 70 of the Amended Complaint speaks for itself and contains legal conclusions to which no response is required and are denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 70 of the Amended Complaint.

71. Defendants admit the allegations set forth in Paragraph 71 of the Amended Complaint.

72. Defendants deny the allegations set forth in Paragraph 72 of the Amended Complaint.

73. Defendants admit that, in past elections, white voters voted for Republican candidates in greater numbers than Black voters and that, in past elections, Black voters have voted for Democratic candidates in greater numbers than white voters. Defendants deny the remaining allegations set forth in Paragraph 73 of the Amended Complaint.

74. Defendants admit that the 2020 Census results are presented accurately in Paragraph 74 of the Amended Complaint and speak for themselves. Defendants deny the remaining allegations set forth in Paragraph 74 of the Amended Complaint.

75. The allegations set forth in Paragraph 75 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

76. Defendants admit that Georgia has a past history of discrimination against Black voters. The remaining allegations in Paragraph 76 of the Amended Complaint are legal conclusions to which no response is required and are denied on that basis.

77. Defendants admit that Georgia has a past history of discrimination against Black voters. The remaining allegations in Paragraph 77 of the Amended Complaint are legal conclusions to which no response is required or are beyond Defendants' knowledge and are therefore denied on those bases.

78. Defendants admit that plans drawn when Democrats controlled Georgia government were found to violate the Voting Rights Act or the Constitution in 1971, 1981, 1991, and 2001. The remaining allegations of

Paragraph 78 of the Amended Complaint set forth legal conclusions to which no response is required and, therefore, Defendants deny the same.

79. Defendants admit that Georgia has a past history of discrimination against Black voters. The remaining allegations set forth in Paragraph 79 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

80. The allegations set forth in Paragraph 80 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

81. The allegations set forth in Paragraph 81 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

82. Defendants admit that the Office of the Secretary of State of Georgia maintains voter records that include self-reported racial demographics of voters to the extent such voters voluntarily disclose such information. Defendants admit that the current Georgia voter-registration form does not ask voters to identify their political party preference. Defendants deny the remaining allegations set forth in Paragraph 82 of the Amended Complaint.

83. Defendants admit the share of voters reporting their race as white has decreased in every presidential election since 2004 and that the total percentage of voters reporting their race as non-white has increased in that same period. The remaining allegations set forth in Paragraph 83 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

84. Defendants admit the allegations set forth in Paragraph 84 of the Amended Complaint.

85. Defendants state that the results of the 2018 elections speak for themselves. Defendants deny the remaining allegations set forth in Paragraph 85 of the Amended Complaint.

86. Defendants admit the allegations set forth in Paragraph 86 of the Amended Complaint.

87. Defendants admit the share of voters reporting their race as white has decreased between 2016 and 2020. The remaining allegations set forth in Paragraph 87 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

88. Defendants admit that, in past elections, Black voters have voted for Democratic candidates in greater numbers than white voters. The

remaining allegations set forth in Paragraph 88 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

89. Defendants admit SB 202 was passed in 2021 and further state that SB 202 speaks for itself. Defendants deny the remaining allegations set forth in Paragraph 89 of the Amended Complaint.

90. Defendants deny the allegations set forth in Paragraph 90 of the Amended Complaint.

91. Defendants deny the allegations set forth in Paragraph 91 of the Amended Complaint.

92. Defendants state that the results of the 2010 and 2020 Census speak for themselves. The remaining allegations set forth in Paragraph 92 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

93. Defendants admit the share of voters reporting their race as white has decreased between 2004 and 2020 and that the share of voters reporting their race as non-white increased during that same period. The remaining allegations set forth in Paragraph 93 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

94. The allegations set forth in Paragraph 94 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

95. Defendants deny the allegations set forth in Paragraph 95 of the Amended Complaint.

96. Defendants admit the allegations set forth in Paragraph 96 of the Amended Complaint.

97. Defendants deny the allegations set forth in Paragraph 97 of the Amended Complaint.

98. The allegations set forth in Paragraph 98 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

99. The allegations set forth in Paragraph 99 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

100. The allegations set forth in Paragraph 100 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

101. The allegations set forth in Paragraph 101 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

102. Defendants deny the allegations set forth in Paragraph 102 of the Amended Complaint.

103. The allegations set forth in Paragraph 103 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

104. Defendants admit the allegations set forth in Paragraph 104 of the Amended Complaint.

105. Defendants admit the allegations set forth in Paragraph 105 of the Amended Complaint.

106. The allegations set forth in Paragraph 106 of the Amended Complaint are outside the knowledge of Defendants and are denied on that basis.

107. Defendants state that the Committee Guidelines and quoted portions of websites in Paragraph 107 of the Amended Complaint speak for themselves. The remaining allegations set forth in Paragraph 107 of the Amended Complaint are outside the knowledge of Defendants and denied on that basis.

108. The allegations set forth in Paragraph 108 of the Amended Complaint contain legal conclusions to which no response is required and are denied on that basis.

109. Defendants deny the allegations set forth in Paragraph 109 of the Amended Complaint.

110. The allegations set forth in Paragraph 110 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

111. Defendants admit the allegations set forth in Paragraph 111 of the Amended Complaint.

112. Defendants admit the allegations set forth in Paragraph 112 of the Amended Complaint.

113. Defendants admit the allegations set forth in Paragraph 113 of the Amended Complaint.

114. Defendants admit that plans were posted for the House and Senate on November 3, 2021, submitted by the chairs of each respective body's redistricting committee. Defendants deny the remaining allegations set forth in Paragraph 114 of the Amended Complaint.

115. The allegations set forth in Paragraph 115 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied

on that basis. Defendants deny the remaining allegations set forth in Paragraph 115 of the Amended Complaint.

116. Defendants deny the allegations set forth in Paragraph 116 of the Amended Complaint.

117. The allegations set forth in Paragraph 117 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

118. The allegations set forth in Paragraph 118 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

119. The allegations set forth in Paragraph 119 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

120. The allegations set forth in Paragraph 120 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

121. The allegations set forth in Paragraph 121 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

122. The allegations set forth in Paragraph 122 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

123. The allegations set forth in Paragraph 123 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

124. The allegations set forth in Paragraph 124 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

125. The allegations set forth in Paragraph 125 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

126. The allegations set forth in Paragraph 126 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

127. Defendants admit the allegations set forth in Paragraph 127 of the Amended Complaint.

128. Defendants admit that Governor Kemp signed the bill enacting the current Senate districts. Defendants deny the remaining allegations set forth in Paragraph 128 of the Amended Complaint.

129. The allegations set forth in Paragraph 129 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

130. The allegations set forth in Paragraph 130 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

131. The allegations set forth in Paragraph 131 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

132. Defendants admit the allegations set forth in Paragraph 132 of the Amended Complaint.

133. Defendants admit that Governor Kemp did not veto the House redistricting plan. Defendants deny the remaining allegations set forth in Paragraph 133 of the Amended Complaint.

134. The allegations set forth in Paragraph 134 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

135. The allegations set forth in Paragraph 135 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

136. The allegations set forth in Paragraph 136 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

137. The allegations set forth in Paragraph 137 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

138. The allegations set forth in Paragraph 138 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

139. Defendants admit the allegations set forth in Paragraph 139 of the Amended Complaint.

140. Defendants deny the allegations set forth in Paragraph 140 of the Amended Complaint.

141. Defendants admit that Governor Kemp signed the congressional district plan and the House and Senate legislative plans into law. Defendants deny the remaining allegations set forth in Paragraph 141 of the Amended Complaint.

142. Defendants deny the allegations set forth in Paragraph 142 of the Amended Complaint.

143. The allegations set forth in Paragraph 143 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

144. The allegations set forth in Paragraph 144 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

145. The allegations set forth in Paragraph 145 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

146. The allegations set forth in Paragraph 146 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

147. Defendants admit that voting in Georgia is polarized. The remaining allegations set forth in Paragraph 147 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

148. The allegations set forth in Paragraph 148 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

149. Defendants deny the allegations set forth in Paragraph 149 of the Amended Complaint.

150. Defendants deny the allegations set forth in Paragraph 150 of the Amended Complaint.

151. Defendants deny the allegations set forth in Paragraph 151 of the Amended Complaint.

152. Defendants deny the allegations set forth in Paragraph 152 of the Amended Complaint.

153. Defendants admit that Congresswoman McBath was elected from CD-6 in 2018. The remaining allegations set forth in Paragraph 153 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

154. The allegations set forth in Paragraph 154 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

155. The allegations set forth in Paragraph 155 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

156. The allegations set forth in Paragraph 156 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

157. The allegations set forth in Paragraph 157 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

158. The allegations set forth in Paragraph 158 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

159. The allegations set forth in Paragraph 159 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

160. Defendants deny the allegations set forth in Paragraph 160 of the Amended Complaint.

161. Defendants deny the allegations set forth in Paragraph 161 of the Amended Complaint.

162. Defendants deny the allegations set forth in Paragraph 162 of the Amended Complaint.

163. Defendants deny the allegations set forth in Paragraph 163 of the Amended Complaint.

164. The allegations set forth in Paragraph 164 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

165. Defendants deny the allegations set forth in Paragraph 165 of the Amended Complaint.

166. Defendants deny the allegations set forth in Paragraph 166 of the Amended Complaint.

167. Defendants deny the allegations set forth in Paragraph 167 of the Amended Complaint.

168. The allegations set forth in Paragraph 168 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

169. Defendants deny the allegations set forth in Paragraph 169 of the Amended Complaint.

170. The allegations set forth in Paragraph 170 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

171. The allegations set forth in Paragraph 171 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

172. The allegations set forth in Paragraph 172 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis.

173. The allegations set forth in Paragraph 173 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations set forth in Paragraph 173 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

174. The allegations set forth in Paragraph 174 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations set forth in Paragraph 174 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

175. The allegations set forth in Paragraph 175 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

176. The allegations set forth in Paragraph 176 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

177. The allegations set forth in Paragraph 177 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

178. The allegations set forth in Paragraph 178 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

179. The allegations set forth in Paragraph 179 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations because they are outside Defendants' knowledge. Defendants deny the remaining allegations set forth in Paragraph 179 of the Amended Complaint.

180. The allegations set forth in Paragraph 180 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations because they are outside Defendants' knowledge. Defendants deny the remaining allegations set forth in Paragraph 180 of the Amended Complaint.

181. The allegations set forth in Paragraph 181 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 181 of the Amended Complaint.

182. The allegations set forth in Paragraph 182 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 182 of the Amended Complaint.

183. The allegations set forth in Paragraph 183 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations because they are outside Defendants' knowledge. Defendants deny the remaining allegations set forth in Paragraph 183 of the Amended Complaint.

184. Defendants state that the result of the 2020 Census speak for themselves and no response is required. The remaining allegations set forth in Paragraph 184 are outside Defendants' knowledge and are therefore denied on that basis.

185. The allegations set forth in Paragraph 185 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 185 of the Amended Complaint.

186. The allegations set forth in Paragraph 186 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 186 of the Amended Complaint.

187. The allegations set forth in Paragraph 187 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 187 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 187 of the Amended Complaint.

188. The allegations set forth in Paragraph 188 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 188 of the Amended Complaint.

189. The allegations set forth in Paragraph 189 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 189 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 189 of the Amended Complaint.

190. The allegations set forth in Paragraph 190 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 190 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 190 of the Amended Complaint.

191. The allegations set forth in Paragraph 191 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 191 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 191 of the Amended Complaint.

192. The demographic changes in the geographic areas reported in Census results referenced in Paragraph 192 of the Amended Complaint speak for themselves and no response is required. The remaining allegations set forth in Paragraph 192 are outside Defendants' knowledge and are therefore denied on that basis.

193. The allegations set forth in Paragraph 193 of the Amended Complaint are contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 193 of the Amended Complaint.

194. Defendants deny the allegations set forth in Paragraph 194 of the Amended Complaint.

195. The allegations set forth in Paragraph 195 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations set forth in Paragraph 195 are outside Defendants' knowledge and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 195 of the Amended Complaint.

196. The allegations set forth in Paragraph 196 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 196 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 196 of the Amended Complaint.

197. Defendants deny the allegations set forth in Paragraph 197 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 197 of the Amended Complaint.

198. Defendants admit that Senate District 35 is located solely in Fulton and Douglas counties. The remaining allegations set forth in

Paragraph 198 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

199. The allegations set forth in Paragraph 199 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

200. The allegations set forth in Paragraph 200 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

201. The allegations set forth in Paragraph 201 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 201 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 201 of the Amended Complaint.

202. The allegations set forth in Paragraph 202 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 202 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 202 of the Amended Complaint.

203. The allegations set forth in Paragraph 203 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 203 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 203 of the Amended Complaint.

204. The allegations set forth in Paragraph 204 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

205. Defendants deny the allegations set forth in Paragraph 205 of the Amended Complaint.

206. The allegations set forth in Paragraph 206 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 206 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 206 of the Amended Complaint.

207. The allegations set forth in Paragraph 207 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

208. The allegations set forth in Paragraph 208 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 208 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 208 of the Amended Complaint.

209. The allegations set forth in Paragraph 209 of the Amended Complaint are outside Defendants' knowledge and are therefore denied on that basis.

210. Defendants deny the allegations set forth in Paragraph 210 of the Amended Complaint.

211. Defendants deny the allegations set forth in Paragraph 211 of the Amended Complaint.

212. The allegations set forth in Paragraph 212 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 212 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 212 of the Amended Complaint.

213. The allegations set forth in Paragraph 213 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 213 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 213 of the Amended Complaint.

214. The allegations set forth in Paragraph 214 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 214 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 214 of the Amended Complaint.

215. The allegations set forth in Paragraph 215 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 215 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 215 of the Amended Complaint.

216. Defendants deny the allegations set forth in Paragraph 216 of the Amended Complaint.

217. Defendants admit that Sen. Au was elected in 2020 to represent Senate District 48. Defendants deny the remaining allegations set forth in Paragraph 217 of the Amended Complaint because they are outside their knowledge.

218. The allegations set forth in Paragraph 218 are outside the knowledge of Defendants and are therefore denied on that basis.

219. The allegations set forth in Paragraph 219 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 219 of the Amended Complaint because they are outside their knowledge.

220. The allegations set forth in Paragraph 220 are outside the knowledge of Defendants and are therefore denied on that basis.

221. The allegations set forth in Paragraph 221 are outside the knowledge of Defendants and are therefore denied on that basis.

222. The allegations set forth in Paragraph 222 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 222 of the Amended Complaint because they are outside

their knowledge. Defendants deny the remaining allegations set forth in Paragraph 222 of the Amended Complaint.

223. The allegations set forth in Paragraph 223 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 223 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 223 of the Amended Complaint.

224. The allegations set forth in Paragraph 224 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 224 of the Amended Complaint because they are outside their knowledge.

225. The allegations set forth in Paragraph 225 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 225 of the Amended Complaint because they are outside their knowledge.

226. The allegations set forth in Paragraph 226 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 226 of the Amended Complaint because they are outside their knowledge.

227. The allegations set forth in Paragraph 227 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 227 of the Amended Complaint because they are outside their knowledge.

228. The allegations set forth in Paragraph 228 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 228 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 228 of the Amended Complaint.

229. The allegations set forth in Paragraph 229 are outside the knowledge of Defendants and are therefore denied on that basis.

230. The allegations set forth in Paragraph 230 are outside the knowledge of Defendants and are therefore denied on that basis.

231. The allegations set forth in Paragraph 231 are outside the knowledge of Defendants and are therefore denied on that basis.

232. The allegations set forth in Paragraph 232 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 232 of the Amended Complaint because they are outside their knowledge.

233. The allegations set forth in Paragraph 233 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 233 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 233 of the Amended Complaint.

234. Defendants deny the allegations set forth in Paragraph 234 of the Amended Complaint.

235. Defendants deny the allegations set forth in Paragraph 235 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 235 of the Amended Complaint.

236. Defendants deny the allegations set forth in Paragraph 236 of the Amended Complaint.

237. Defendants deny the allegations set forth in Paragraph 237 of the Amended Complaint.

238. The allegations set forth in Paragraph 238 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

239. The allegations set forth in Paragraph 239 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

240. The allegations set forth in Paragraph 240 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 240 of the Amended Complaint because they are outside their knowledge.

241. The allegations set forth in Paragraph 241 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 241 of the Amended Complaint because they are outside their knowledge.

242. The allegations set forth in Paragraph 242 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 242 of the Amended Complaint because they are outside their knowledge.

243. The allegations set forth in Paragraph 243 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 243 of the Amended Complaint because they are outside their knowledge.

244. The allegations set forth in Paragraph 244 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 244 of the Amended Complaint because they are outside their knowledge.

245. The allegations set forth in Paragraph 245 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

246. The allegations set forth in Paragraph 246 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set

forth in Paragraph 246 of the Amended Complaint because they are outside their knowledge.

247. The allegations set forth in Paragraph 247 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

248. The allegations set forth in Paragraph 248 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 248 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 248.

249. The allegations set forth in Paragraph 249 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 249 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 249.

250. Defendants deny the allegations set forth in Paragraph 250 of the Amended Complaint.

251. The allegations set forth in Paragraph 251 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

252. The allegations set forth in Paragraph 252 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 252 of the Amended Complaint because they are outside their knowledge.

253. The allegations set forth in Paragraph 253 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 253 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 253.

254. The allegations set forth in Paragraph 254 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 254 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 254.

255. The allegations set forth in Paragraph 255 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 255 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 255.

256. The allegations set forth in Paragraph 256 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 256 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 256.

257. Defendants deny the allegations set forth in Paragraph 257 of the Amended Complaint.

258. The allegations contained in Paragraph 258 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

259. The allegations contained in Paragraph 259 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

260. The allegations contained in Paragraph 260 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

261. The allegations contained in Paragraph 261 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

262. The allegations contained in Paragraph 262 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

263. The allegations contained in Paragraph 263 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

264. The allegations set forth in Paragraph 264 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 264 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 264 of the Amended Complaint.

265. The allegations set forth in Paragraph 265 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants further deny the allegations set forth in Paragraph 265 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 265 of the Amended Complaint.

266. Defendants deny the allegations set forth in Paragraph 266 of the Amended Complaint because they are outside their knowledge.

267. The allegations set forth in Paragraph 267 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 267 of the Amended Complaint because they are outside their knowledge. Defendants deny the remaining allegations set forth in Paragraph 267 of the Amended Complaint.

268. The allegations set forth in Paragraph 268 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 268 of the Amended Complaint because they are outside their knowledge.

269. Defendants deny the allegations set forth in Paragraph 269 of the Amended Complaint.

270. The allegations set forth in Paragraph 270 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

271. The allegations set forth in Paragraph 271 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

272. The allegations set forth in Paragraph 272 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 272 of the Amended Complaint

273. The allegations set forth in Paragraph 273 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

274. Defendants admit that the largest city in Dougherty County is Albany. The remaining allegations set forth in Paragraph 274 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

275. The allegations set forth in Paragraph 275 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore denied on that basis.

276. The allegations set forth in Paragraph 276 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 276 of the Amended Complaint.

277. The allegations set forth in Paragraph 277 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

278. Defendants deny the allegations set forth in Paragraph 278 of the Amended Complaint.

279. The allegations set forth in Paragraph 279 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

280. The allegations set forth in Paragraph 280 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis.

281. The allegations set forth in Paragraph 281 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

282. The allegations set forth in Paragraph 282 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

283. The allegations set forth in Paragraph 283 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 283 of the Amended Complaint.

284. The allegations set forth in Paragraph 284 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis.

285. The allegations set forth in Paragraph 285 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis.

286. The results of the 2020 Census speak for themselves and no response is required. The remaining allegations set forth in Paragraph 286 are outside the knowledge of Defendants and are therefore denied on that basis.

287. Defendants deny the allegations set forth in Paragraph 287 of the Amended Complaint.

288. The allegations set forth in Paragraph 288 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 288 of the Amended Complaint

289. The allegations set forth in Paragraph 289 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 289 of the Amended Complaint.

290. The allegations set forth in Paragraph 290 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis.

291. The allegations set forth in Paragraph 291 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis.

292. The allegations set forth in Paragraph 292 of the Amended Complaint contain legal conclusions to which no response is required and are

therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis.

293. Defendants deny the allegations set forth in Paragraph 293 of the Amended Complaint.

294. Defendants deny the allegations set forth in Paragraph 294 of the Amended Complaint.

295. The allegations set forth in Paragraph 295 are outside the knowledge of Defendants and are therefore denied on that basis.

296. The allegations set forth in Paragraph 296 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

297. The allegations set forth in Paragraph 297 contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations set forth in Paragraph 297 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

298. The allegations set forth in Paragraph 298 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations set forth in Paragraph 298 of the Amended Complaint are outside the knowledge of

Defendants and are therefore denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 298 of the Amended Complaint.

299. The allegations set forth in Paragraph 299 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations set forth in Paragraph 299 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

300. Defendants deny the allegations set forth in Paragraph 300 of the Amended Complaint.

301. The result of the 2010 Census and the 2020 Census speak for themselves and no response is required. The remaining allegations set forth in Paragraph 301 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

302. The allegations set forth in Paragraph 302 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 302 of the Amended Complaint.

303. The allegations set forth in Paragraph 303 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

304. The allegations set forth in Paragraph 304 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

305. Defendants deny the allegations set forth in Paragraph 305 of the Amended Complaint.

306. Defendants deny the allegations set forth in Paragraph 306 of the Amended Complaint.

307. The allegations set forth in Paragraph 307 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

308. The allegations set forth in Paragraph 308 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

309. The allegations set forth in Paragraph 309 of the Amended Complaint are outside the knowledge of Defendants and are therefore denied on that basis.

310. The allegations set forth in Paragraph 310 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 310 of the Amended Complaint.

311. The allegations set forth in Paragraph 311 of the Amended Complaint contain legal conclusions to which no response is required and are therefore denied on that basis. The remaining allegations are outside the knowledge of Defendants and are therefore further denied on that basis. Defendants deny the remaining allegations set forth in Paragraph 311 of the Amended Complaint.

312. Defendants deny the allegations set forth in Paragraph 312 of the Amended Complaint.

313. Defendants repeat each and every response contained in the paragraphs above as if fully set forth here.

314. Defendants deny the allegations set forth in Paragraph 314 of the Amended Complaint.

315. Defendants deny the allegations set forth in Paragraph 315 of the Amended Complaint.

316. Defendants deny the allegations set forth in Paragraph 316 of the Amended Complaint.

317. Defendants deny the allegations set forth in Paragraph 317 of the Amended Complaint.

318. Defendants deny the allegations set forth in Paragraph 318 of the Amended Complaint.

319. Defendants deny the allegations set forth in Paragraph 319 of the Amended Complaint and deny that Plaintiffs are entitled to any relief.

320. Defendants repeat each and every response contained in the paragraphs above as if fully set forth here.

321. Paragraph 321 contains legal conclusions to which no response is required. Defendants state that the Voting Rights Act speaks for itself and deny any allegations set forth in Paragraph 321 of the Amended Complaint not consistent therewith.

322. Paragraph 322 contains legal conclusions to which no response is required. Defendants state that the Voting Rights Act and referenced caselaw speak for themselves and deny any allegations set forth in Paragraph 322 of the Amended Complaint not consistent therewith.

323. Defendants deny the allegations set forth in Paragraph 323 of the Amended Complaint.

324. Defendants deny the allegations set forth in Paragraph 324 of the Amended Complaint.

325. Defendants deny the allegations set forth in Paragraph 325 of the Amended Complaint.

326. Defendants deny the allegations set forth in Paragraph 326 of the Amended Complaint.

327. Defendants admit that plans drawn when Democrats controlled Georgia government were found to violate the Voting Rights Act or the Constitution in 1971, 1981, 1991, and 2001. Defendants deny the remaining allegations set forth in Paragraph 327 of the Amended Complaint.

328. Defendants deny the allegations set forth in Paragraph 328 of the Amended Complaint.

329. Defendants deny the allegations set forth in Paragraph 329 of the Amended Complaint.

330. Defendants deny the allegations set forth in Paragraph 330 of the Amended Complaint.

331. Defendants deny the allegations set forth in Paragraph 331 of the Amended Complaint.

332. Defendants deny the allegations set forth in Paragraph 332 of the Amended Complaint.

333. Defendants deny the allegations set forth in Paragraph 333 of the Amended Complaint.

334. Defendants deny the allegations set forth in Paragraph 334 of the Amended Complaint and deny that Plaintiffs are entitled to any relief.

335. Defendants repeat each and every response contained in the paragraphs above as if fully set forth here.

336. Paragraph 336 of the Amended Complaint contains legal conclusions to which no response is required. Defendants further state that 42 U.S.C. § 1983 speaks for itself and Defendants deny any allegations set forth in Paragraph 336 of the Amended Complaint not consistent therewith.

337. Defendants admit the allegations set forth in Paragraph 337 of the Amended Complaint.

338. Paragraph 338 of the Amended Complaint contains legal conclusions to which no response is required. Defendants further state that the Voting Rights Act speaks for itself and Defendants deny any allegations set forth in Paragraph 338 of the Amended Complaint not consistent therewith.

339. Defendants deny the allegations set forth in Paragraph 339 of the Amended Complaint.

340. Defendants deny the allegations set forth in Paragraph 340 of the Amended Complaint.

341. Defendants deny the allegations set forth in Paragraph 341 of the Amended Complaint.

342. Defendants deny the allegations set forth in Paragraph 342 of the Amended Complaint.

343. Defendants deny the allegations set forth in Paragraph 343 of the Amended Complaint.

344. Defendants deny the allegations set forth in Paragraph 344 of the Amended Complaint and deny that Plaintiffs are entitled to any relief.

PRAYER FOR RELIEF

Defendants deny that Plaintiffs are entitled to any relief requested in the Amended Complaint in their Prayer for Relief section.

If the allegations in any Paragraph of the Amended Complaint is not responded to above, it is denied.

Respectfully submitted this 11th day of October, 2022.

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing DEFENDANTS' ANSWER TO PLAINTIFFS' AMENDED COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson
Bryan P. Tyson