

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

SOLICITOR GENERAL BRIAN W.
WHITESIDE,

Plaintiff,

v.

No. 1:21-cv-3618-JPB

BRAD RAFFENSPERGER, et al.,
Defendants,

REPUBLICAN NATIONAL
COMMITTEE; NATIONAL
REPUBLICAN SENATORIAL
COMMITTEE; and GEORGIA
REPUBLICAN PARTY, INC.,

Proposed Intervenor-Defendants.

[PROPOSED] INTERVENOR-DEFENDANTS'
[PROPOSED] ANSWER

Intervenors—the Republican National Committee, National Republican Senatorial Committee, and Georgia Republican Party, Inc.—now answer Plaintiff's amended complaint (Doc. 2). Unless expressly admitted below, every allegation in the complaint is denied. Accordingly, Intervenors state:

Ln 20-26: Admitted that Plaintiff brings this action under Section 2 of the Voting Rights Act of 1965 and Title 42 of the United States Code seeking prospective declaratory and injunctive relief against the named defendants. Denied that he has a valid claim.

Ln 29-33: Admitted.

Ln 36-52: Admitted that Plaintiff is Solicitor General Brian W. White-side of Gwinnett County. Intervenors lack sufficient information to admit or deny the remaining allegations.

Ln 55-77: These legal arguments require no response. The Election Integrity Act speaks for itself.

Ln 78-94: These legal arguments require no response. Intervenors lack sufficient information to admit or deny the remaining allegations.

Ln 97-99: These legal arguments require no response.

Ln 102-04: These legal arguments require no response.

Ln 107-08: These legal arguments require no response.

Ln 112-14: These legal arguments require no response.

RESPONSE TO PRAYER FOR RELIEF

Intervenors deny that Plaintiff is entitled to any relief.

AFFIRMATIVE DEFENSES

1. Plaintiff lacks Article III standing.
2. The allegations in the complaint fail to state a claim.
3. Plaintiff's requested relief is barred by the *Purcell* principle.

Dated: September 17, 2021

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this document complies with Local Rule 5.1(B) because it uses 13-point Century Schoolbook font.

/s/ William Bradley Carver

CERTIFICATE OF SERVICE

On September 17, 2021, I e-filed this document on ECF, which will serve everyone requiring service.

/s/ William Bradley Carver