

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

CORECO JA'QAN PEARSON, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION NO.
v.	)	1:20-cv-4809-TCB
	)	
BRIAN KEMP, <i>et al.</i> ,	)	
	)	
Defendants.	)	

STATE DEFENDANTS' MOTION TO DISMISS

Defendants Governor Brian Kemp, Secretary of State Brad Raffensperger, and State Election Board members Rebecca N. Sullivan, David J. Worley, Matthew Mashburn, and Ahn Le (collectively, "State Defendants") hereby move to dismiss Plaintiffs' Complaint for pursuant to FED. R. CIV. P. 12(b)(1) and (6) for lack of subject matter jurisdiction and various other threshold defenses stated in the accompanying brief in support. The State Defendants also move that the Court deny any injunctive, declaratory relief, and other relief sought in the Plaintiffs' Complaint. State Defendants respectfully request that the Court grant their motion and dismiss the action with prejudice. A brief in support of this motion is being filed simultaneously.

Respectfully submitted, this 5th day of December, 2020.

Christopher M. Carr	112505
Attorney General	
Bryan K. Webb	743580
Deputy Attorney General	
Russell D. Willard	760280
Senior Assistant Attorney General	

/s/ Charlene S. McGowan
Charlene S. McGowan 697316
Assistant Attorney General
40 Capitol Square SW
Atlanta, GA 30334
cmcgowan@law.ga.gov
404-458-3658 (tel)

Carey Miller
Georgia Bar No. 976240
cmiller@robbinsfirm.com
Josh Belinfante
Georgia Bar No. 047399
jbelinfante@robbinsfirm.com
Melanie Johnson
Georgia Bar No. 466756
mjohnson@robbinsfirm.com

**Robbins Ross Alloy Belinfante Littlefield
LLC**
500 14th Street NW
Atlanta, GA 30318
Telephone: (678) 701-9381
Facsimile: (404) 856-3250

Attorneys for State Defendants

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing has been formatted using Times New Roman font in 14-point type in compliance with Local Rule 7.1(D).

/s/ Charlene S. McGowan
Charlene S. McGowan
Assistant Attorney General

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing **STATE DEFENDANTS' MOTION TO DISMISS** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to counsel for all parties of record via electronic notification.

Dated: December 5, 2020.

/s/ Charlene S. McGowan
Charlene S. McGowan
Assistant Attorney General