

ORIGINAL

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

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U.S.D.C. Atlanta

AUG 14 2006

By: JAMES N. MARTEN, Clerk  
Deputy Clerk

ASSOCIATION OF COMMUNITY )  
ORGANIZATIONS FOR REFORM )  
NOW, *et al.*, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
CATHY COX, *et al.*, )  
 )  
Defendants. )

CIVIL ACTION NO.

**1:06-CV-1891**

JTC

**PLAINTIFFS' MOTION TO EXPEDITE CONSIDERATION OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION  
AND FOR LEAVE TO EXCEED PAGE LIMITATIONS**

Pursuant to Local Rules 7.2(B) and 7.1(D) of the Northern District of Georgia and the inherent powers of the Court, Plaintiffs respectfully request that the Court enter a show-cause order setting an expedited hearing and briefing schedule on Plaintiffs' motion for a preliminary injunction at its earliest opportunity. In addition, in connection with the briefing on the preliminary injunction motion, Plaintiffs request that the parties be allowed to file briefs in excess of the page limitations set forth in L.R. 7.1(D), as follows: briefs in support of or in response to the preliminary injunction motion may be up to 40 pages in

length, and Plaintiffs' reply brief may be up to 20 pages in length. In further support of their motion, Plaintiffs state as follows:

In their Complaint, Plaintiffs seek to have this Court invalidate and enjoin a regulation recently passed by the Georgia State Election Board which imposes severe restrictions on the right of Plaintiffs and other private entities to conduct voter registration drives within Georgia. *See* Ga. Comp. R. & Regs. r. 183-1-6-.03(3)(o)(2) (as amended eff. Jan. 17, 2006) (the "Regulation"). The Regulation requires completed voter registration applications to be separately sealed by the applicants before being handed to a private entity (the "sealing requirement") and prohibits copying of completed voter registration applications (the "copying ban"). Plaintiffs contend that the Regulation violates their rights under the National Voter Registration Act of 1993, 42 U.S.C. § 1973gg *et seq.* ("NVRA"), and the First and Fourteenth Amendments to the Constitution.

Plaintiffs have asked for a preliminary injunction because they are being irreparably harmed by the Regulation, which is significantly interfering with and burdening (and in some cases completely foreclosing) their ability and right to plan and implement effective voter registration, education, and get-out-the-vote ("GOTV") programs in Georgia in connection with the upcoming statewide

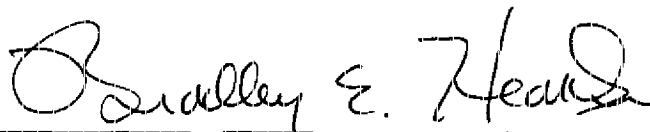
general election in November 2006, which includes candidates for federal, statewide, and local office. The voter registration deadline for the November elections is October 10, 2006 (less than two months away). Plaintiffs need to begin their voter registration activities as soon as possible if there is to be any hope of mounting any effective civic engagement programs in Georgia for this election season.

WHEREFORE, Plaintiffs pray that their motion to expedite consideration of the preliminary injunction motion and for leave to file briefs in excess of page limitations will be granted. **A proposed Order is attached for the Court's convenience.**

[Signatures Contained on Following Page]

This 14<sup>th</sup> day of August, 2006.

Respectfully Submitted,



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Bradley E. Heard  
Georgia Bar No. 342209  
MOLDEN HOLLEY FERGUSSON  
THOMPSON & HEARD, LLC  
34 Peachtree Street, NW, Suite 1700  
Atlanta, GA 30303-2337  
Tel.: 404-324-4500  
Fax: 404-324-4501  
Email: [bheard@moldenholley.com](mailto:bheard@moldenholley.com)

*Counsel for All Plaintiffs*

Brian W. Mellor  
Massachusetts Bar No. 43072  
(*Pro hac vice* application forthcoming)  
1486 Dorchester Avenue  
Dorchester MA 02122  
Tel.: 617-282-3666  
Fax: 617-436-4878  
Email: [electioncounsel1@projectvote.org](mailto:electioncounsel1@projectvote.org)

*Counsel for ACORN, Project Vote, and  
Dana Williams*

Elizabeth S. Westfall  
D.C. Bar No. 458792  
Estelle H. Rogers  
D.C. Bar No. \_\_\_\_\_  
(*Pro hac vice* applications forthcoming)  
ADVANCEMENT PROJECT  
1730 M Street, NW, Suite 910  
Washington, DC 20036  
Tel.: 202-728-9557  
Fax: 202-728-9558  
Email: [ewestfall@advancementproject.org](mailto:ewestfall@advancementproject.org)  
[erogers@advancementproject.org](mailto:erogers@advancementproject.org)

*Counsel for ACORN and Project Vote*

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1**

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, using a font type of Times New Roman and a point size of 14.



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Bradley E. Heard  
Georgia Bar No. 342209