

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

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

**CIVIL ACTION NO.  
1:06-CV-1891-JTC**

**MOTION TO COMPEL**

COME NOW Defendants in the above styled action and pursuant to F.R. Civ. P. 33, 34 and 37 and LR 37 and LR 37.1, NDGa., hereby move to compel full and proper responses to the following discovery:

- Defendants’ First Interrogatories to Plaintiff Association of Community Organizations for Reform Now (“ACORN”);
- Defendants’ First Interrogatories to Plaintiff Georgia Coalition for the People’s Agenda (“GCPA”);
- Defendants’ First Interrogatories to Georgia State Conference of NAACP Branches (“Ga. NAACP”);

- Defendants' First Interrogatories to Project Vote/Voting for America Inc. ("Project Vote");
- Secretary of State's First Request For Production of Documents to ACORN;
- Secretary of State's First Request For Production of Documents to GCPA;
- Secretary of State's First Request For Production of Documents to Ga. NAACP;
- Secretary of State's First Request For Production of Documents to Project Vote;

In addition, Defendants move that all interrogatory responses made by the Plaintiffs be verified.

In support of this motion Defendants show that Plaintiffs have willfully attempted to avoid responding to discovery or provide information regarding their claims. In support of this motion Defendants rely all pleadings and orders on file in this action, on Defendants' discovery and Plaintiffs' responses forming the basis of this motion, and on the Memorandum in Support of Defendants' Motion to Compel and the Good Faith Certificate of Defendants' Counsel, both filed contemporaneously herewith.

Respectfully submitted,

THURBERT BAKER                      033887  
Attorney General

DENNIS DUNN                              269350  
Deputy Attorney General

/s/Stefan Ritter  
STEFAN RITTER                              606950  
Senior Assistant Attorney General

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**SIGNATURE CERTIFICATION**

I certify that the originally executed document contains the signatures of all filers indicated herein and therefore represents consent for filing of this document.

/s/Stefan Ritter  
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**CERTIFICATE OF SERVICE**

I do hereby certify that I have this day served the within and foregoing **MOTION TO COMPEL** with the Clerk of Court using the CM/ECF system, which will send notification of filing to the following CM/ECF participants:

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This 4th day of June, 2007.

/s/Stefan Ritter  
STEFAN RITTER  
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