

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

BLACK VOTERS MATTER FUND,  
MEGAN GORDON, PENELOPE  
REID, and ANDY KIM, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, in his  
official capacity as Secretary of State of  
Georgia; DEKALB COUNTY BOARD  
OF REGISTRATION & ELECTIONS;  
ANTHONY LEWIS, SUSAN  
MOTTER, DELE LOWMAN SMITH,  
SAMUEL E. TILLMAN, and BAOKY  
N. VU, in their official capacities as  
Members of the DeKalb County Board  
of Registration & Elections; and ERICA  
HAMILTON, in her official capacity as  
Director of Voter Registration and  
Elections, and all others similarly  
situated,

Defendants.

Civil Action No.: 20-cv-1489-AT

Class Action

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**PLAINTIFFS' BRIEF IN OPPOSITION TO**  
**DEFENDANT RAFFENSPERGER'S MOTION TO DISMISS THE**  
**AMENDED COMPLAINT**

The Secretary has filed a motion to dismiss the amended complaint, incorporating his prior briefs in connection with the Secretary's Motion to Dismiss the Complaint. Doc. 90. Plaintiffs oppose the Secretary's motion also by incorporating their prior Brief in Opposition to the Secretary's Motion to Dismiss. Doc. 84. Because Plaintiffs agree with the Secretary that "the new individual plaintiffs are similarly situated to the existing individual Plaintiff, Ms. Gordon," Doc. 90 at 2, the prior arguments about Ms. Gordon's standing also apply to the new individual plaintiffs. Doc. 84 at 28-29.

Thus, the Secretary's Motion to Dismiss the Amended Complaint should be denied. If the Secretary chooses to file a reply, Plaintiffs respectfully request that any reply be filed within 24 hours.

Respectfully submitted this 12th day of May, 2020.

**Sean Young**

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**CERTIFICATE OF COMPLIANCE**

Pursuant to N.D. Ga. Local Civil Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with N.D. Ga. Local Civil Rule 5.1(C) in Times New Roman 14-point typeface.

**Sean Young**

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 12, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system.

**Sean Young**

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