

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

ANNIE LOIS GRANT; QUENTIN T.
HOWELL; ELROY TOLBERT; TRIANA
ARNOLD JAMES; EUNICE SYKES;
ELBERT SOLOMON; DEXTER
WIMBISH; GARRETT REYNOLDS;
JACQUELINE FAYE ARBUTHNOT;
JACQUELYN BUSH; and MARY NELL
CONNER,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State;
WILLIAM S. DUFFEY, JR., in his official
capacity as chair of the State Election
Board; MATTHEW MASHBURN, in his
official capacity as a member of the State
Election Board; SARA TINDALL
GHAZAL, in her official capacity as a
member of the State Election Board;
EDWARD LINDSEY, in his official
capacity as a member of the State Election
Board; and JANICE W. JOHNSTON, in
her official capacity as a member of the
State Election Board,

Defendants.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

**PLAINTIFFS' CONSENT MOTION FOR LEAVE TO FILE EXCESS
PAGES**

Pursuant to Section III.C of this Court’s standing order, Plaintiffs ANNIE LOIS GRANT, QUENTIN T. HOWELL, ELROY TOLBERT, TRIANA ARNOLD JAMES, EUNICE SYKES, ELBERT SOLOMON, DEXTER WIMBISH, GARRETT REYNOLDS, JACQUELINE FAYE ARBUTHNOT, JACQUELYN BUSH, and MARY NELL CONNER respectfully move the Court for leave to file a reply in support of their motion for partial summary judgment, *see* ECF No. 189, that exceeds the Court’s page limits under LR 7.1(D), NDGa.

Defendants’ opposition to Plaintiffs’ motion for partial summary judgment, *see* ECF No. 203, raises various factual and legal issues that require Plaintiffs’ response. Motions practice in election- and redistricting-related cases—including this one—often requires briefing that exceeds the limits of LR 7.1(D), NDGa. *See, e.g.,* ECF No. 198 (granting Defendants’ request to file 35-page response in opposition to Plaintiffs’ motion for partial summary judgment); *see also Ga. State Conf. of NAACP v. Fayette Cnty. Bd. of Comm’rs*, 775 F.3d 1336, 1343 (11th Cir. 2015) (emphasizing importance of detailed factual findings and legal conclusions in Section 2 vote-dilution cases). Accordingly, Plaintiffs respectfully request an additional ten (10) pages—for a total of twenty-five (25) pages—for their forthcoming reply in support of their motion for partial summary judgment.

Counsel for Plaintiffs have contacted counsel for Defendants regarding this motion, and Defendants have consented to the 10-page addition.

A proposed order is attached for the Court's convenience.

Dated: April 28, 2023

By: **Adam M. Sparks**
Joyce Gist Lewis
Georgia Bar No. 296261
Adam M. Sparks
Georgia Bar No. 341578
KREVOLIN & HORST, LLC
One Atlantic Center
1201 West Peachtree Street, NW,
Suite 3250
Atlanta, Georgia 30309
Telephone: (404) 888-9700
Facsimile: (404) 888-9577
Email: JLewis@khlawfirm.com
Email: Sparks@khlawfirm.com

Respectfully submitted,

Abha Khanna*
Jonathan P. Hawley*
Makeba A.K. Rutahindurwa*
ELIAS LAW GROUP LLP
1700 Seventh Avenue,
Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0177
Facsimile: (206) 656-0180
Email: AKhanna@elias.law
Email: JHawley@elias.law
Email: MRutahindurwa@elias.law

Michael B. Jones
Georgia Bar No. 721264
ELIAS LAW GROUP LLP
250 Massachusetts Avenue NW,
Suite 400
Washington, D.C. 20001
Phone: (202) 968-4490
Facsimile: (202) 968-4498
Email: MJones@elias.law

Counsel for Plaintiffs

**Admitted pro hac vice*

CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing Plaintiffs' Consent Motion for Leave to File Excess Pages has been prepared in accordance with the font type and margin requirements of LR 5.1, NDGa, using font type of Times New Roman and a point size of 14.

Dated: April 28, 2023

Adam M. Sparks
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have on this date caused to be electronically filed a copy of the foregoing Plaintiffs' Consent Motion for Leave to File Excess Pages with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to counsel of record.

Dated: April 28, 2023

Adam M. Sparks
Counsel for Plaintiffs

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

ANNIE LOIS GRANT; QUENTIN T.
HOWELL; ELROY TOLBERT; TRIANA
ARNOLD JAMES; EUNICE SYKES;
ELBERT SOLOMON; DEXTER
WIMBISH; GARRETT REYNOLDS;
JACQUELINE FAYE ARBUTHNOT;
JACQUELYN BUSH; and MARY NELL
CONNER,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his official
capacity as the Georgia Secretary of State;
WILLIAM S. DUFFEY, JR., in his official
capacity as chair of the State Election
Board; MATTHEW MASHBURN, in his
official capacity as a member of the State
Election Board; SARA TINDALL
GHAZAL, in her official capacity as a
member of the State Election Board;
EDWARD LINDSEY, in his official
capacity as a member of the State Election
Board; and JANICE W. JOHNSTON, in
her official capacity as a member of the
State Election Board,

Defendants.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

**PROPOSED ORDER GRANTING PLAINTIFFS' CONSENT MOTION
FOR LEAVE TO FILE EXCESS PAGES**

This Court has considered Plaintiffs' consent motion for leave to file excess pages for their reply in support of their motion for partial summary judgment (Doc. No. __) and finds that Plaintiffs have established good cause to file an additional ten (10) pages. Plaintiffs' motion is therefore **GRANTED**.

Plaintiffs may file an additional ten (10) pages, for a total of twenty-five (25) pages, for their reply in support of their motion for partial summary judgment.

IT IS SO ORDERED, this _____ day of _____, 2023.

HONORABLE STEVE C. JONES
UNITED STATES DISTRICT JUDGE