

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

COMMON CAUSE, et al.,

Plaintiffs,

v.

BRAD RAFFENSPERGER, in his
official capacity as Secretary of State
of Georgia, et al.,

Defendants.

Case No. 1:22-CV-0090-
SCJ-SDG-ELB

STATUS REPORT

Pursuant to this Court’s order dated January 6, 2022, Plaintiffs Common Cause, League of Women Voters of Georgia, Dr. Ursula Thomas, Jasmine Bowles, and Dr. H. Benjamin Williams (“Common Cause”) hereby submit the following Status Report.

1. Consolidation

Common Cause has met and conferred with the other Plaintiffs covered by this Court’s order as well as Defendant Raffensperger. Due to the factual, legal, and procedural similarity of Common Cause’s and the Georgia State Conference of the NAACP’s (“NAACP”) constitutional challenges, Common Cause and the NAACP agree that their constitutional claims can and should be consolidated before a three-judge panel for purposes of conducting all proceedings, including discovery and hearings in connection with any request(s) for preliminary injunctive relief.

Although there is some factual overlap with the Section 2 claims, those claims do not share common legal, procedural, or jurisdictional issues and therefore consolidation with those claims is inappropriate. Common Cause will of course endeavor to coordinate discovery to the extent feasible.

2. Scheduling

Common Cause has met and conferred with Defendant Raffensperger and all plaintiffs covered by this Order with respect to scheduling. Common Cause's proposed scheduling is consistent with that of the NAACP:

| | |
|---|---------------------------|
| Deadline for amendments to complaints | March 30, 2022 |
| Deadline to complete fact discovery | November 23, 2022 |
| Deadline for filing expert reports | December 23, 2023 |
| Deadline for rebuttal expert reports | January 23, 2023 |
| Deadline to complete expert discovery | February 17, 2023 |
| Deadline to file dispositive motions | March 10, 2023 |
| Deadline to file oppositions to dispositive motions | April 10, 2023 |
| Deadline to file replies in support of dispositive motions | April 17, 2023 |
| Deadline to file pretrial stipulations, exhibits, witness lists | 20 days before trial date |
| Deadline for filing of <i>Daubert</i> and in limine motions | 15 days before trial date |
| Trial date | To be set by the Court |

3. Preliminary Injunctive Relief

At this time, Common Cause is not seeking preliminary injunctive relief and does not have a proposed schedule for the same.

Dated this 11th day of January
2022.

Respectfully submitted,

/s/ Jack Genberg

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CERTIFICATE OF COMPLIANCE AND OF SERVICE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing **STATUS REPORT** has been prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(c), and that I provided notice and copy of the foregoing using the CM/ECF system which will automatically send e-mail notification of such filing to all attorneys of record.

/s/ Jack Genberg

Jack Genberg (Ga. Bar 144076)