

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

GEORGIA STATE CONFERENCE  
OF THE NAACP, *et al.*,

*Plaintiffs,*

v.

STATE OF GEORGIA, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:21-CV-05338-SCJ

**RESPONSE TO PLAINTIFFS' MOTION FOR  
LEAVE TO AMEND COMPLAINT**

Defendants do not oppose Plaintiffs' Motion for Leave to Amend their Complaint. Doc. No. [56]. At such time as the Amended Complaint becomes the operative Complaint in this matter, Defendants will file a renewed motion to dismiss on the same grounds as those outlined in their prior Motion to Dismiss. Doc. No. [47].

Respectfully submitted this 13th day of April, 2022.

Christopher M. Carr  
Attorney General  
Georgia Bar No. 112505  
Bryan K. Webb  
Deputy Attorney General  
Georgia Bar No. 743580  
Russell D. Willard  
Senior Assistant Attorney General

Georgia Bar No. 760280  
Charlene S. McGowan  
Assistant Attorney General  
Georgia Bar No. 697316  
40 Capitol Square, S.W.  
Atlanta, Georgia 30334

/s/ Bryan P. Tyson

Bryan P. Tyson  
Special Assistant Attorney General

Georgia Bar No. 515411  
btyson@taylorenghish.com

Frank B. Strickland  
Georgia Bar No. 687500  
fstrickland@taylorenghish.com

Bryan F. Jacoutot  
Georgia Bar No. 668272  
bjacoutot@taylorenghish.com

Loree Anne Paradise  
Georgia Bar No. 382202  
lparadise@taylorenghish.com

**TAYLOR ENGLISH DUMA LLP**  
1600 Parkwood Circle, Suite 200  
Atlanta, GA 30339  
Telephone: (678) 336-7249

*Attorneys for Defendants*

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned certifies that the foregoing Response Brief has been prepared in Century Schoolbook 13, a font and type selection approved by the Court in L.R. 5.1(B).

/s/ Bryan P. Tyson  
Bryan P. Tyson