

IN THE SUPERIOR COURT OF DEKALB COUNTY
STATE OF GEORGIA

WILLIAM HENDERSON and DEKALB)
COUNTY REPUBLICAN PARTY,)

Plaintiffs,)

v.)

VASU ABHIRAMAN, NANCY JESTER,)
ANTHONY LEWIS, SUSAN MOTTER, and)
KARLI SWIFT,)

Defendants,)

CIVIL ACTION FILE NO. 24CV8564

GEORIGIA STATE CONFERENCE OF THE)
NAACP, NEW GEORGIA PROJECT,)
GEORGIA COALITION FOR THE)
PEOPLE’S AGENDA, INC., A. PHILLIP)
RANDOLPH INSTITUTE, COMMON)
CAUSE GEORGIA, and LEAGUE OF)
WOMEN VOTERS OF GEORGIA,)

Proposed Intervenors.

**MOTION BY GEORGIA STATE CONFERENCE OF THE NAACP, NEW GEORGIA
PROJECT, GEORGIA COALITION FOR THE PEOPLE’S AGENDA, INC., A. PHILLIP
RANDOLPH INSTITUTE, COMMON CAUSE GEORGIA, AND LEAGUE OF WOMEN
VOTERS OF GEORGIA TO INTERVENE AS DEFENDANTS**

Proposed Intervenors Georgia State Conference of the NAACP, New Georgia Project, Georgia Coalition for the People’s Agenda, Inc., A. Phillip Randolph Institute, Common Cause Georgia, and League of Women Voters of Georgia (the “Proposed Intervenors”) move to participate as intervening defendants. For the reasons discussed in the Memorandum of Law in support of this Motion, attached as Exhibit 1, Proposed Intervenors are entitled to intervene in this case as a matter of right under O.C.G.A § 9-11-24(a)(2). In the alternative, Proposed Intervenors request permissive intervention under O.C.G.A § 9-11-24(b)(2). Proposed Intervenors have filed

a Proposed Order granting the Motion to Intervene as Exhibit 2. Under O.C.G.A § 9-11-24(c), Proposed Intervenors have filed a Proposed Motion to Dismiss the Application for Writ of Mandamus, attached as Exhibit 3. Should the Court deny the Motion to Dismiss, Proposed Intervenors have attached a Proposed Answer as Exhibit 4. Declarations in support of the Motion to Intervene on behalf of the Proposed Intervenor Organizations are attached as Exhibits 5-10.

Respectfully submitted this 2nd day of October, 2024:

/s/ Gerald Weber
Gerald Weber (Ga. Bar No. 744878)
**LAW OFFICES OF GERRY WEBER,
LLC**
P.O. Box 5391
Atlanta, Georgia 31107
(404) 522-0507
wgerryweber@gmail.com

Ezra D. Rosenberg*
Julie M. Houk*
Pooja Chaudhuri*
Alexander S. Davis*
Heather Szilagyi*
**LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW**
1500 K Street NW, Suite 900
Washington, D.C. 20005
(202) 662-8600
erosenberg@lawyerscommittee.org
jhouk@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org
adavis@lawyerscommittee.org
hszilagyi@lawyerscommittee.org

On behalf of the: Georgia State Conference
of the NAACP and Georgia Coalition for the
People's Agenda, Inc.

John Powers*
Hani Mirza*

ADVANCEMENT PROJECT
1220 L Street Northwest, Suite 850
Washington, D.C. 20005
(202) 728-9557
jpowers@advancementproject.org
hmirza@advancementproject.org

On behalf of the: New Georgia Project and
A. Phillip Randolph Institute.

John A. Freedman*
**ARNOLD & PORTER
KAYE SCHOLER LLP**
601 Massachusetts Ave. N.W.
Washington, DC 20001
(202) 942 5000
john.freedman@arnoldporter.com

On Behalf of the: Georgia State Conference
of the NAACP, New Georgia Project,
Georgia Coalition for the People's Agenda,
Inc, and the A. Phillip Randolph Institute.

John S. Cusick*
Stuart Naifeh*
Morenike Fajana*
Allison Scharfstein*
**NAACP LEGAL DEFENSE
& EDUCATIONAL FUND, INC.**
40 Rector Street, 5th Floor
New York, NY 10006
jcusick@naacpldf.org
snaifeh@naacpldf.org
mfajana@naacpldf.org
aschafstein@naacpldf.org

R. Gary Spencer (Ga. Bar No. 671905)
**NAACP LEGAL DEFENSE
& EDUCATIONAL FUND, INC.**
260 Peachtree St. NW, Ste 2300
Atlanta, GA 30303
gspencer@naacpldf.org

On behalf of the: Georgia State Conference
of the NAACP and Georgia Coalition for the
People's Agenda, Inc.