

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

VASU ABHIRAMAN, TERESA K.
CRAWFORD, LORETTA MINANDOLA,
JENNIFER MOSBACHER, ANITA TUCKER,
ESSENCE JOHNSON, LAUREN WAITS,
SUZANNE WAKEFIELD, MICHELLE AU,
JASMINE CLARK, DEMOCRATIC
NATIONAL COMMITTEE, and
DEMOCRATIC PARTY OF GEORGIA, INC.,

Petitioners,

v.

STATE ELECTION BOARD,

Respondent.

Civil Case No. 24CV010786

**MOTION OF AMICI CURIAE ELBERT SOLOMON, PORCH’S MILLER, AVA
BUSSEY, BRIAN NGUYEN, RAYNARD LANIER, JR., AND THE GEORGIA STATE
CONFERENCE OF THE NAACP TO FILE AN AMICUS BRIEF IN SUPPORT OF
PETITIONERS’ VERIFIED PETITION FOR DECLARATORY RELIEF**

Amici, Elbert Solomon, Porch’s Miller, Ava Busey, Brian Nguyen, Raynard LaNier, Jr., and the Georgia State Conference of the NAACP hereby move this Court for leave to file an amicus brief in support of Petitioners’ Verified Petition for Declaratory Relief. As explained in the attached brief, amici are registered Georgia voters (“Amici Voters”) and a non-profit, nonpartisan organization (“Georgia NAACP”) of Georgia-voter members who intend to make their voices heard in local, statewide, and national contests this November, and do not want their votes nullified. Amici Voters reside and are registered to vote in five different counties where members of their county election boards have previously attempted to weaponize certification to block ballots from counting toward the official results. The Georgia NAACP also has members residing and registered to vote in all of Georgia’s 159 counties. Amici have a strong

interest in ensuring their boards of elections will timely certify their county's election returns and the right of Georgia voters, like themselves and their members, to exercise their right to vote and to have their votes counted. Amici seek to assist this Court by offering their unique perspectives regarding the consequences for voters in Spalding County, DeKalb County, Cobb County, Gwinnett County, and Fulton County and across the state should the State Election Board rules at issue in this matter be read to render county-level certification discretionary in contravention of Georgia law. WHEREFORE, amici request that this Court accept and consider the ELBERT SOLOMON, PORCH'SE MILLER, AVA BUSSEY, BRIAN NGUYEN, RAYNARD LANIER, JR., AND THE GEORGIA STATE CONFERENCE OF THE NAACP TO FILE AN AMICUS BRIEF IN SUPPORT OF PETITIONERS' VERIFIED PETITION FOR DECLARATORY RELIEF, attached hereto.

Respectfully submitted, this 9th day of September, 2024.

/s/ Caitlin May

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**Motion for Pro Hac Vice forthcoming*

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September, 2024, a true and correct copy of the foregoing **MOTION TO FILE AMICUS BRIEF IN SUPPORT OF PETITIONERS' VERIFIED PETITION FOR DECLARATORY RELIEF** was electronically filed with the Court using the Court's eFileGA electronic filing system, which will automatically send an email notification of such filing to all attorneys of record, and was additionally served by emailing a copy to the currently known counsel of named parties and proposed intervenors as listed below:

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