

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

KAREN FINN, *et al.*,

Plaintiffs,

v.

COBB COUNTY BOARD OF
ELECTIONS AND
REGISTRATION, *et al.*,

Defendants.

Civil Action No.
1:22-cv-2300-ELR

EMERGENCY JOINT MOTION TO MODIFY REMEDIAL SCHEDULE

COME NOW, Plaintiffs Karen Finn, Dr. Jillian Ford, Hylah Daly, Jenne Dulcio, GALEO Latino Community Development Fund, Inc., New Georgia Project Action Fund, League of Women Voters of Marietta-Cobb, and Georgia Coalition For The People’s Agenda, Inc. (the “Plaintiffs”), jointly with the Cobb County Board of Elections and Registration and Janine Eveler, in her official capacity as Director of the Cobb County Board of Elections and Registration (the “Defendants”), and hereby jointly move this Court to modify the remedial schedule set forth in its order granting Plaintiffs’ Motion for Preliminary Injunction, ECF

No. 212.

1. On December 14, 2023, the Court granted Plaintiffs' Motion for Preliminary Injunction and enjoined the implementation of the Cobb County School Board map enacted in 2022. ECF No. 212. In its order, the Court set forth a remedial schedule, which it noted was "largely based upon proposals [the Parties] made in a filing dated September 11, 2023." *Id.* at 33 (citing ECF No. 180).

2. The Parties' September proposals regarding a remedial schedule were based on the understanding at the time that Defendants needed six weeks prior to the beginning of the anticipated candidate qualifying period to properly implement any remedial map. ECF No. 180 at 2. Based on this timeline, the Parties believed that if the Court granted Plaintiffs' Motion for Preliminary Injunction, any order adopting a remedial map would need to be issued no later than January 22, 2024.

3. Based on new information from the Secretary of State's Office and Defendants' subsequent investigations, Defendants alerted Plaintiffs at approximately 12:00 P.M. on January 8, 2024 and hereby stipulate that a remedial map can be properly implemented so long as it is adopted by the Court no later than February 9, 2024.

4. Given this new information, the Parties seek to modify the remedial proceedings to provide the General Assembly with additional time to adopt a

remedial map if it chooses to do so.

5. The Parties request this Court grant the instant Motion and order that the remainder of the remedial proceedings follow the schedule set forth below:

<u>Event</u>	<u>Deadline</u>
Deadline for Georgia General Assembly to adopt a remedial map.	January 22, 2024
Deadline for Parties or Amici to submit objections to the General Assembly's remedial map and/or submit other proposed remedial maps.	January 24, 2024
Deadline for Parties or Amici to submit responses to objections to the General Assembly's remedial map and/or respond to other proposed remedial maps.	January 26, 2024
Deadline for Parties or Amici to submit replies to responses to objections to the General Assembly's remedial map and/or reply to responses regarding other proposed remedial maps.	January 30, 2024
Deadline for remedial map to be in place and approved by Court.	February 9, 2024

Respectfully submitted this 9th day of January, 2024,

/s/ Sofia Fernandez Gold

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/s/ Caren E. Short

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CERTIFICATION OF COMPLIANCE

Pursuant to Local Rule 7.1, the undersigned counsel hereby certifies that this document has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1.

Dated this 9th day of January, 2024.

/s/ Sofia Fernandez Gold
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CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

/s/ Julie M. Houk

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