

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

JAMAL BROOKS, an individual;
AUSTIN THOMPSON, an
individual; WAYNE SWANSON, an
individual; DARRYL PAYTON, an
individual; AUDRA
CUNNINGHAM, an individual;
SABRINA MCKENZIE, an
individual; JAMIDA ORANGE, an
individual, ANDREA SNOW, an
individual; SAMMY ARREY-MBI;
LYNNE ANDERSON, an individual;
and CORETTA JACKSON, an
individual,

Plaintiffs,

v.

BRIAN KEMP, in his official
capacity as Secretary of State of the
State of Georgia,

Defendant.

Civil Action No.
1:17-CV-03856-AT

**NOTICE OF CLAIM OF
UNCONSTITUTIONALITY**

Pursuant to Federal Rule of Civil Procedure 5.1, Plaintiffs hereby submit this Notice of Claim of Unconstitutionality regarding the Georgia General Assembly redistricting plan, Act No. 251 (2015 Ga. Laws 1413) (“H.B. 566”). In the above captioned action, Plaintiffs are challenging H.B. 566 on the grounds that it violates Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, and the Fourteenth and Fifteenth Amendments to the U.S. Constitution.

Dated: October 3, 2017

Respectfully submitted,

By /s/ Quinton Washington

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of October, 2017, I 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.

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