

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

COMMON CAUSE / GEORGIA,	)	
et al.	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION
	)	FILE NO.:
MS. EVON BILLUPS, Superintendent of	)	4:05-CV- 201 HLM
Elections for the Board of Elections and	)	
Voter Registration for Floyd County and the	)	
City of Rome, Georgia, et al.	)	
	)	
Defendants.	)	

**First Amendment to the Plaintiffs’ Complaint**

Come now the Plaintiffs, who pursuant to FRCP 15 (a), amend their Complaint as a matter of right by adding a new Paragraph 1(i) and who show this Court as follows:

1.

- (i) Common Cause, the League, The Central Presbyterian and Advocacy Center, Inc., Georgia Association of Black Elected Officials, Inc., The National Association for the Advancement of Colored People (NAACP), Inc. GLBC, and the Concerned Black Clergy of Metropolitan Atlanta, Inc., (in the aggregate, the “Non-Profit Plaintiffs”), are non-profit organizations composed of members who would have standing to sue in their individual right for the allegations set forth in the Complaint, the interests which each of the Non-Profit Plaintiffs and their members seek to protect in the Complaint are germane to the purpose of each of the Non-Profit Plaintiffs, and neither the

claim or the relief sought requires participation by the individual members of the Non-Profit Plaintiffs.

Respectfully Submitted

By: /s/ Emmet J. Bondurant  
Emmet J. Bondurant  
Georgia Bar No.: 066900  
David G. H. Brackett  
Georgia Bar No.: 068353

BONDURANT, MIXSON & ELMORE, LLP  
3900 One Atlantic Center  
1201 W. Peachtree Street  
Atlanta, Georgia 30309  
Telephone: 404-881-4100  
Facsimile: 404-881-4111  
Email: [bondurant@bmelaw.com](mailto:bondurant@bmelaw.com)  
[brackett@bmelaw.com](mailto:brackett@bmelaw.com)

By: /s/ Edward Hine, Jr.  
Edward Hine, Jr.  
Georgia Bar Nom: 355755

LAW OFFICES OF EDWARD HINE, Jr.  
P. O. Box 5511  
111 Bridgepoint Plaza, Suite 300  
Rome, Georgia 30162-5511  
Telephone: 706-291-2531  
Facsimile: 706-291-1301  
Email: [ehinejr@bellsouth.net](mailto:ehinejr@bellsouth.net)

Miles J. Alexander  
Georgia Bar No.: 009000  
Seth A. Cohen  
Georgia Bar NO.: 175198

1100 Peachtree Street, NE  
Suite 2800  
Atlanta, Georgia 30309  
Telephone: 404-815-6500  
Facsimile: 404-815-6555  
Email: [MAlexander@kilpatrickstockton.com](mailto:MAlexander@kilpatrickstockton.com)  
[SCohen@kilpatrickstockton.com](mailto:SCohen@kilpatrickstockton.com)

Ralph I. Knowles  
Georgia Bar No.: 426721

DOFFERMYER, SHIELDS, CANFIELD,  
KNOWLES & DEVINE, LLC  
1355 Peachtree Street  
Suite 1600  
Atlanta, Georgia 30309  
Telephone: 404-881-8900  
Facsimile: 404-881-3007  
Email: [rknowles@dskd.com](mailto:rknowles@dskd.com)

Gerald Weber  
Georgia Bar No.: 744878  
Elizabeth Littrell  
Georgia Bar No.: 454949  
Margaret F. Garrett  
Georgia Bar No.: 255865

ACLU OF GEORGIA  
70 Fairlie Street, SW  
Suite 340  
Atlanta, Georgia 30303  
Telephone: 404-523-6201  
Facsimile: 404-577-0181  
Email: [gweber@acluga.org](mailto:gweber@acluga.org)  
[blittrell@acluga.org](mailto:blittrell@acluga.org)  
[mgarrett@acluga.org](mailto:mgarrett@acluga.org)

Neil Bradley  
Georgia Bar No.: 075125  
Laughlin McDonald  
Georgia Bar No.: 489550  
Meredith Bell-Platts  
Georgia Bar No.: 048948

ACLU SOUTHERN REGIONAL OFFICE

2725 Harris Tower  
233 Peachtree Street, NE  
Atlanta, Georgia 30303  
Telephone: 404-523-2721  
Facsimile: 404-653-0331  
Email: [nbradley@aclu.org](mailto:nbradley@aclu.org)  
[lmcdonald@aclu.org](mailto:lmcdonald@aclu.org)

John Greenbaum  
LAWYERS COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW  
1401 New York Avenue, NW  
Suite 400  
Washington, DC 20005  
Telephone: 202-622-8315  
Facsimile: 202-628-2858  
Email: [jgreenbaum@lawyerscommittee.org](mailto:jgreenbaum@lawyerscommittee.org)

Kimberly Perkins  
The National Association for the Advancement  
of Colored People (NAACP), Inc.  
4805 M. Hope Drive  
Baltimore, Maryland 21215-3297  
Telephone: 410-580-5794

Theodore M. Shaw  
Director-Counsel  
Normal J. Chachkin  
Debo P. Adebile  
NAACP Legal Defense & Educational  
Fund, Inc.  
99 Hudson Street, 16<sup>th</sup> Floor  
New York, NY 10013  
Telephone: 212-965-2200  
Facsimile: 212-226-7592

Tisha R. Tallman  
Georgia Bar No.: 69649  
Southeast Regional Counsel  
MALDEF, The Mexican American Legal Defense & Educational Fund  
41 Marietta Street, Suite 1000  
Atlanta, Georgia 30303  
Telephone: 678-559-1071  
Toll Free: 877-4MALDEF (1-877-462-5333)  
Facsimile: 678-559-1079  
Email: [ttallman@maldef.org](mailto:ttallman@maldef.org)

Daniel B. Kohrman  
AARP FOUNDATION LITIGATION  
601 E Street, NW, Suite A4-240  
Washington, DC 20049  
Telephone: 202-434-2064  
Facsimile: 202-434-6424  
Email: [dkohrman@aarp.org](mailto:dkohrman@aarp.org)

*Attorneys for Plaintiffs*

Certificate of Service

I certify that I have electronically filed the aforementioned amendment which in turn will serve all counsel who have appeared of record be email and by hand delivery.

This 12<sup>th</sup> day of October, 2005.

/s/ Edward Hine, Jr.  
Ga.Bar No: 355755

LAW OFFICES OF EDWARD HINE, Jr.  
P. O. Box 5511  
111 Bridgepoint Plaza, Suite 300  
Rome, Georgia 30162-5511  
Telephone: 706-291-2531  
Facsimile: 706-291-1301  
Email: [ehinejr@bellsouth.net](mailto:ehinejr@bellsouth.net)