IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

MATHIS KEARSE WRIGHT, JR., Plaintiff, v. SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION, Defendant.	CIVIL ACTION NO. 1:14-CV-42 (WLS)

DEFENDANT'S AMENDED NOTICE REGARDING OBJECTIONS TO PLAINTIFF'S EXHIBITS AND PROCEDURE REGARDING IMPLEMENTATION OF ANY REMEDY

On November 20, 2017, this Court ordered the parties to raise any objections to the other party's exhibits and "to submit their views on the procedure required for any order implementing a redistricting plan in this action were Plaintiff to prevail, specifically whether the Georgia Legislature must be given the first opportunity to approve a new redistricting plan," by Wednesday, December 6, 2017. Pursuant to that Order, and Rule 26(a)(3)(B), Defendant filed its initial Notice on Wednesday, December 6, 2017.

Defendant hereby amends that Notice by withdrawing objections to Plaintiff's proposed witnesses for trial. Defendant's other objections from that Notice remain and are restated herein for completeness.

I. Defendant's Objections to Plaintiff's Proposed Exhibits

Defendant's objections to Plaintiff's proposed exhibits are identified in the attached chart to the extent those objections were discernable given the time allotted for review and the large volume of exhibits exchanged by Plaintiff. On Monday night, December 4, 2017, Plaintiff sent

to Defendant electronic copies of 272 proposed exhibits totaling close to 50,000 pages. Defendant reserves objections under Federal Rules of Evidence 402 and 403.

Defendant's objection related to legal authorities included on Plaintiff's proposed exhibit list bears a brief description. Ninety-one of these exhibits purport to be Georgia laws and code sections dated between 1777 and 1976. (PX35-PX124; PX266; PX268). One hundred twenty-one of these exhibits purport to be case law. (PX125-242; PX246-PX247; PX249-250). In total, 212 of the 272 exhibits proposed by Plaintiff are legal authority.

Admitting these materials as exhibits is unnecessary. Plaintiff does not need these materials admitted as exhibits to cite to them or rely on them as factual or legal support. To the extent Plaintiff has concerns about the accessibility of any of these materials, he can use the procedure commonly employed by lawyers citing to unpublished opinions: he can attach a copy of any cited authority to the related brief.

Admitting these materials as exhibits will consume valuable court time. Even if an ancient document rule applies to cure hearsay objections, who will Plaintiff have testify about all of these materials? Given the volume of documents, including 200 years of Georgia laws and code the most recent of which is 40 years old, it will be difficult if not impossible for the Court to ensure that these proposed exhibits are what they purport to be and are accurate and legible copies thereof. Indeed, at least eight of Plaintiff's proposed exhibits raise legibility concerns (PX40; PX46; PX53; PX74; PX75; PX251; PX257; PX258), and at least seven of Plaintiff's proposed exhibits raise concerns about completeness (PX67; PX68; PX71; PX76; PX108; PX122; PX260).

II. Defendant's Views on Procedure Required for Implementing any Remedy

If the Court determines that the Sumter County School Board districting plan violates the Voting Rights Act, the case would shift to remedial proceedings that would, if necessary, proceed in two steps.

First, the Court must afford the legislature a reasonable opportunity to remedy the legal defect through a new plan. *Reynolds v. Sims*, 377 U.S. 533, 586 (1964). At the first step, this Court would be required to provide reasonable time for the General Assembly to "address [the] highly political task" of creating a new plan; during this time "federal judges" must "defer." *Growe v. Emison*, 507 U.S. 25, 33 (1993); *Scott v. Germano*, 381 U.S. 407, 409 (1965). This rule, applicable in all redistricting cases, applies with equal force in VRA Section 2 cases. *See, e.g., Cane v. Worcester Cty., Md.*, 840 F. Supp. 1081, 1091 (D. Md. 1994); *McGhee v. Granville Cty., N.C.*, 860 F.2d 110, 115 (4th Cir. 1988); *Bonilla v. City Council of City of Chicago*, 809 F. Supp. 590, 596 (N.D. Ill. 1992); *Large v. Fremont Cty., Wyo.*, 670 F.3d 1133, 1138 (10th Cir. 2012); *see also Tallahassee Branch of NAACP v. Leon Cty., Fla.*, 827 F.2d 1436, 1437 (11th Cir. 1987) (discussing remedial phase of Section 2 litigation).[1] What amounts to a reasonable time to remedy the violation depends on the circumstances, including at what time the legislature is in session and the timing of the Court's decision. Reserving the right to take a different position

[1] To be sure, this principle does not diminish Plaintiff's burden to show a reasonable alternative plan as part of their *prima facie* case. The law is clear that, "along with determining whether the *Gingles* preconditions are met," the Court "must find a reasonable alternative practice as a benchmark against which to measure the existing voting practice." *Holder v. Hall*, 512 U.S. 874, 880 (1994). It is not enough to show that that the "lines could have been drawn elsewhere, nothing more." *Johnson v. De Grandy*, 512 U.S. 997, 1015 (1994). But, if the Court finds that Plaintiff's alternative plan is a reasonable alternative that improves the position of Sumter County's black community (which Sumter County vigorously contests), the Court is *not* entitled simply to impose that alternative as law, because it merely serves the purpose of showing that an improved alternative is *possible*. The legislature is primarily responsible to enact a remedy, whether or not it chooses Plaintiff's proposed remedy.

based on subsequent developments, Sumter County estimates at this time that a two-month time for remediation would be reasonable.

Second, if the legislature fails to pass a new plan, the Court must undertake the "unwelcome" task of creating a plan that remedies the violation. *Wise v. Lipscomb*, 437 U.S. 535, 540 (1978). The Court, however, would not be similarly situated with the legislature in this task. It would have no freedom to make its own policy, but would be required to "honor state policies" and not "unnecessarily put aside" the legislature's prior districting decisions. *White v. Weiser*, 412 U.S. 783, 796 (1973). The Court must choose a remedial plan "which most clearly approximate[s] the reapportionment plan of the state legislature, while satisfying constitutional requirements." *Id.*; *see also Upham v. Seamon*, 456 U.S. 37, 42–44 (1982). The state plan serves as a starting point for the district court. *Perry v. Perez*, 565 U.S. 388, 394 (2012). Again, the precise nature of the remedy would depend in large part on the nature of the violation (if any) the Court finds, so further proceedings would be required for the parties to offer their positions on proposed remedies.

Submitted by:

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ATTORNEYS FOR DEFENDANT SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION

CERTIFICATE OF SERVICEU

I hereby certify that on this 6th day of December, 2017 the foregoing Notice was filed and served pursuant to the Court's electronic filing procedures using the Court's CM/ECF system.

s/ Katherine L. McKnight_____
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ATTORNEYS FOR DEFENDANT SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION

Exhibit A

Defendant's Objections to Plaintiff's Proposed Exhibits

Wright v. Sumter County Board of Elections and Registration

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Defendant's Objections to Plaintiff's Proposed Exhibits

Exhibit No.	Description	Defendant's Objections
1	McBride Curriculum Vitae	
2	McBride Expert Report (August 12, 2014)	Subject to pending Daubert motion.
3	Plaintiff's Illustrative Plan (McBride Rep., Appx B)	Subject to pending Daubert motion.
4	Select Demographic Charts (McBride Expert Report, Appx D)	Subject to pending Daubert motion.
5	McBride Rebuttal Report (September 23, 2014)	Subject to pending Daubert motion.
6	McBride Supplemental Report (Corrected, March 8, 2017)	Disclosed outside applicable scheduling order without leave of Court; subject to pending Daubert motion.
7	Table 1 - Sumter County BOE Population Summary	Subject to pending Daubert motion.
8	Table 2 – Plaintiff's Illustrative Plan Population Summary	Subject to pending Daubert motion.
9	Table 3 – Black Voting-Age Population and Minority Electoral Success	Subject to pending Daubert motion.
10	Table 4 – Sumter County At-Large Elections Under HB 836	Subject to pending Daubert motion.
11	Table 5 – Sumter County General Elections for Districts Under HB 836	Subject to pending Daubert motion.
12	Table 6 – Sumter County General Elections Under HB 836 that did not include Black Candidates	Subject to pending Daubert motion.
13	Table 7 – Sumter County Other At-Large General Elections that Included Black Candidates	Subject to pending Daubert motion.
14	Table 8 – Sumter County General Elections Under Prior Plan that Included Black Candidates	Subject to pending Daubert motion.
15	Table 9 – Sumter County Special Election Under Prior Plan that Included Black Candidate	Subject to pending Daubert motion.
16	Table 10 – Participation Rates by Race in Select Sumter County Elections	Subject to pending Daubert motion.
17	McBride Rebuttal Report (December 16, 2016)	Subject to pending Daubert motion.
18	Map of Sumter County Voting Precincts	
19	Map of Sumter County BOE Districts	
20	Map of Sumter County BOE Districts (Old)	
21	Select Sumter County Election Returns	
22	Voter History Files	
23	2004-11-04 - Sumter County Turnout by Race	
24	2016-05-24 – Sumter County Turnout by Race	
25	Participation Rates by Race in Select Sumter County Elections (as a percentage of turnout)	Fails to identify source of information.
26	House Bill 836	
27	Select Census Data – 2011-2015 American Community Survey	
28	Section 5 Submission File No. 2011-4261	
29	Section 5 Submission File No. 2011-3249	
30	Section 5 Submission File No. 2010-2954	
31	Additional Sumter County Election Returns	
32	Additional Sumter County Turnout by Demographics	
33	Summary of Turnout Data	Fails to identify source of information.
34	Summary of Election Data	
35	Ga. Const. of 1777, art. IX (limiting the right to vote to "male white inhabitants, of the age of twenty-one years")	Legal authority.
36	Georgia Laws 1859, p. 54 (making it actionable per se to "impute to any white woman of this State, carnal knowledge and connection with a slave, negro, or free person of color").	Legal authority.
37	Ga. Const. of 1861, art. V, § 542.1 (limiting the franchise to "free white male citizens of this State").	Legal authority.
38	Code of Georgia of 1861, §§ 4496, 4500 (making it a crime to teach "any slave, negro, or free person of color, to read or write").	Legal authority.
39	Ga. Const of 1865., art. V, § 639.1 (limiting the franchise to "free white male citizens of this State").	Legal authority.
40	Ga. Const. of 1865, art. V, § I, para. 9 (prohibiting interracial marriage).	Legal authority; illegible.
41	1866 Ga. Laws, p. 59 (restricting attendance at schools to "white" inhabitants).	Legal authority.
42	1866 Ga. Laws, p. 239 (defining "persons of color" as "all negroes, mulattoes, mestizoes, and their descendants, having one-eighth negro, or African blood, in their veins").	Legal authority.
43	1866 Ga. Laws, p. 241 (making it a misdemeanor for any official to issue a marriage license to an interracial couple).	Legal authority.
44	1866 Ga. Laws, p. 156 ("ordained colored ministers" authorized to marry "persons of African descent only").	Legal authority.

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45	1866 Ga. Laws, pp. 156-57 ("an Act to prescribe and regulate the relation of parent and child among persons of color in this state").	Legal authority.
46	1868 Ga. Laws, pp. 294-95 (Resolution of the House of Representatives expelling the twenty-five negro members elected to it because "[f]ree persons of color . . . are, under the Constitution of the State of Georgia, ineligible to seats on the floor of this House.").	Legal authority; illegible.
47	1870 Ga. Laws, pp. 398, 427-28; 1890-91 Ga. Laws, pp. 157-58; 1899 Ga. Laws, pp. 66-67; 1931 Ga. Laws Exec. Sess., p. 107; 1931 Ga. Laws, p. 204 (providing for segregation in common carriers, and civil and criminal penalties for violations).	Legal authority.
48	1871 Ga. Laws, p. 74 (imposing payment of a poll tax as a condition for voting).	Legal authority.
49	1871 Ga. Laws, p. 265 (abolishing elected offices in majority black McIntosh County).	Legal authority.
50	1872 Ga. Laws, p. 279 (abolishing locally elected school boards in favor of appointments by racially exclusive grand juries).	Legal authority.
51	1873 Ga. Laws, p. 25 (changing residency in the State from six months to one year, and in the counties from thirty days to six months, as a requirement for voting).	Legal authority.
52	1874 Ga. Laws, p. 109 (providing for an annual report of the Comptroller General of the amount of all taxes paid by "colored taxpayers in this State").	Legal authority.
53	Ga. Const. of 1877, art. II, § I, para. II (adopting a cumulative poll tax).	Legal authority; illegible.
54	1890 Ga. Laws, p. 210 (giving political parties the exclusive power to regulate and conduct primary elections).	Legal authority.
55	1891 Ga. Laws, p. 157 (requiring racial segregation on railroads and street cars).	Legal authority.
56	1894 Ga. Laws, pp. 115, 117 (requiring racial designation of voters in the voters' book, "that is to say, whether white or colored").	Legal authority.
57	1897 Ga. Laws, pp. 71, 73 (requiring the "keeping separate and apart of white and colored convicts when not at work, and when actually engaged in work to be kept separate and apart as far as practicable").	Legal authority.
58	1908 Ga. Laws, pp. 1119, 1123-24 (requiring segregation in employment and accommodations at state prison farms "and in awarding the labor of convicts to counties and municipalities").	Legal authority.
59	1908 Ga. Laws, pp. 27-31 (the law, labeled the "Disfranchising Act," established a literacy test, poll tax, property ownership requirement and good character test for voting).	Legal authority.
60	Governor Hoke Smith, Address to the Georgia Legislature, concerning 1908 Ga. Laws, pp. 10-11, 16-21 (June 24, 1908) (referring to the new registration legislation as the "Disfranchisement Act" and urging the legislature to maintain "the purity of the ballot box").	Legal authority.
61	1908 Ga. Laws, pp. 58-59 (limiting voting for the Governor and members of the General Assembly in the general election to those who had paid all taxes due by at least six months before the election and requiring voter registration lists to show the race of all voters).	Legal authority.
62	1905 Ga. Laws, pp. 127, 129 (providing for the segregation of the races in the Georgia State Reformatory).	Legal authority.
63	1913 Ga. Laws, p. 115 (implementing a system of permanent registration requiring all voters to submit to examination by a board of registrars).	Legal authority.
64	1925 Ga. Laws, pp. 286-87 (denying a license to any white person to operate a billiard room patronized by "negroes" or to any "negro" to operate a billiard room patronized by whites and requiring a sworn affidavit of compliance with this statute).	Legal authority.
65	1927 Ga. Laws, pp. 272-79 (redefining "persons of color" as those with "any ascertainable trace of either Negro or African, West Indian, or Asiatic Indian blood in their veins," and all descendants of such persons; defining white persons as those of "the white or Caucasuan race, who have no ascertainable trace of either Negro, African, West Indian, Asiatic Indian, Mongolian, Japanese, or Chinese blood"; providing for the registration of persons by race by the State Registrar of Vital Statistics; that no person, anyone whose ancestors has been duly registered as a "colored person," shall be deemed a white person; providing that "it shall be unlawful for a white person to marry any save a white person"; that making a false statement as to race in any marriage license is a felony; that performing an illegal marriage is a misdemeanor; that refusing to execute or give racial information on a marriage license is a misdemeanor; and that failure of an Ordinary to comply with the registration provisions is a misdemeanor).	Legal authority.
66	1931 Ga. Laws 1931, p. 134 (changing the name of the School of Agriculture and Mechanical Arts to that of State Teachers and Agriculture College for Negroes).	Legal authority.
67	Ga. Code Ann. § 35-225 (1933) (requiring racial segregation in hospitals).	Legal authority; completeness.

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68	Ga. Code Ann. § 77-9904 (1933) (requiring racial segregation in prisons).	Legal authority; completeness.
69	Ga. Code Ann. § 77-613 (1933) (requiring racial segregation in training schools).	Legal authority.
70	Ga. Code Ann. §§ 18-206, 18-209 (1933) (requiring racial segregation in public transportation).	Legal authority.
71	Ga. Code Ann. § 92-6307 (1933) (requiring racial segregation of tax records).	Legal authority; completeness.
72	1937 Ga. Laws, p. 682 (providing for a "colored division on the Georgia Training School for Girls").	Legal authority.
73	1938 Ga. Laws, p. 185 (providing for racially segregated tax digests).	Legal authority.
74	Ga. Const. of 1945, art. VII, § 1, para 4 (requiring that all endowments to charitable institutions "established for white people, shall be limited to white people, and all endowments to institutions established for colored people, shall be limited to colored people").	Legal authority; illegible.
75	Ga. Const. of 1945, art. VIII, § 1, para. 1 (requiring "[s]eparate schools. . . for the white and colored races").	Legal authority.
76	Ga. Const. of 1945, art. I, § I, para. XVIII (providing that "[t]he social status of the citizen shall never be the subject of legislation").	Legal authority; completeness.
77	1945 Ga. Laws, p. 397-98 (providing that "[c]olored and white children shall not attend the same schools; and no teacher receiving or teaching white or colored pupils in the same schools shall be allowed any compensation out of the common school fund").	Legal authority.
78	1947 Ga. Laws, pp. 1183-86 (allowing tax exemptions for endowments for schools and requiring segregation in connection therewith).	Legal authority.
79	1949 Ga. Laws, pp. 1204-27 (enacted after abolition of the white primary; establishing various devices to be used for discrimination, including a purge law and registration requirement of literacy or ability to answer 10 of 30 factual questions correctly).	Legal authority.
80	1955 Ga. Laws, pp. 185-87 (House Resolution asking Congress to call a convention to amend the Constitution of the United States to require the armed services to assign members to racially segregated units).	Legal authority.
81	1955 Ga. Laws, p. 174 (prohibiting the use of state or local funds for any school system "which does not provide separate schools for white and colored children throughout the entire district or system and in which all the white and colored children attending public schools do not attend separated schools").	Legal authority.
82	1955 Ga. Laws, pp. 9-10 (House Resolution urging Congress to call a convention to amend the Constitution of the United States to strip federal courts of jurisdiction in school cases).	Legal authority.
83	1955 Ga. Laws, pp. 4-5 (House Resolution urging the Congress to call a convention to amend the Constitution of the United States to vest "exclusive and complete power" over schools in the states).	Legal authority.
84	1956 Ga. Laws, pp. 642-48, 815-16 (interposition resolution defying United States Supreme Court and federal government's power to interfere with racial segregation).	Legal authority.
85	1956 Ga. Laws, pp. 605-06 (State Patrol and Georgia Bureau of Investigation authorized to make arrests and enforce State's segregation laws).	Legal authority.
86	1956 Ga. Laws, pp. 397-98 (House Resolution urging Congressional delegation from Georgia to oppose federal school bill which would authorize denial of financial aid to states refusing to desegregate schools).	Legal authority.
87	1956 Ga. Laws, pp. 6-9 (authorizing the Governor to close any public school system and providing for grants from public funds to enable students to attend private schools).	Legal authority.
88	1956 Ga. Laws, pp. 22-23 (authorizing state and local governments to dispose of any property comprising parks, swimming pools, or other property "dedicated to public use for recreational or park purposes").	Legal authority.
89	1956 Ga. Laws, pp. 756-64 (providing for cut-off of state funds upon admission of black students to state university).	Legal authority.
90	1956 Ga. Laws, p. 38 (adopting a new state flag incorporating the design of the Battle Flag of the Confederacy).	Legal authority.
91	1957 Ga. Laws, pp. 553-68 (House Resolution calling for impeachment of the United States Supreme Court Justices and charging connections between communism and racial integration).	Legal authority.
92	1957 Ga. Laws, pp. 348-51 (House Resolution urging Congress to enact legislation "to declare that the 14th and 15th Amendments to the Constitution of the United States were never validly adopted and that they are null and void and of no effect").	Legal authority.
93	1957 Ga. Laws, pp. 44-48 (authorizing the Governor to call out the militia in cases of "unlawful assemblage").	Legal authority.
94	1957 Ga. Laws, p. 658 (statute aimed at civil rights lawyers and civil rights lawsuits making it a crime to "engage in exciting and stirring up" litigation).	Legal authority.

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Defendant's Objections to Plaintiff's Proposed Exhibits

95	1958 Ga. Laws, pp. 269, 274-83 (establishing new discriminatory registration requirements, including purge law, vague reading and writing tests, and a requirement that illiterates answer 20 of 30 questions in order to become registered).	Legal authority.
96	1958 Ga. Laws, pp. 13-14 (House Resolution censoring President Eisenhower for sending "airborne storm troopers of the United States Army into a sovereign state to enforce integration of the races at bayonet point in the Central High School of Little Rock, Arkansas," and charging that "the President sacrificed the honesty and integrity of our highest executive office on an altar of political expediency to appease the NAACP and other radical, communist-sympathizing organizations").	Legal authority.
97	1959 Ga. Laws, pp. 15-17 (authorizing the Governor to close any public school "to preserve the good order, peace and dignity of the State," and establishing criminal sanction in conjunction therewith).	Legal authority.
98	1959 Ga. Laws, p. 18 (authorizing the Governor to close the University System of Georgia "to preserve the good order, peace and dignity of the State").	Legal authority.
99	1959 Ga. Laws, pp. 383-85 (House Resolution requesting Congress to amend the Constitution of the United States "to grant to the several States the same right to control its public school system as has been granted to Alaska").	Legal authority.
100	1960 Ga. Laws, pp. 147-49 (municipal school systems deprived of power to levy taxes upon admitting any blacks to white schools).	Legal authority.
101	1960 Ga. Laws, pp. 1187-91 (House Resolution noting that "there has been ingrained forever in the hearts and minds of all Georgians the custom of segregation of the races in the schools of the state," and declaring that "the great majority of the members of this Assembly who were elected on a pledge to maintain segregated schools at all costs are not willing to retreat from that position" and creating a committee to study the closing of all public schools).	Legal authority.
102	1960 Ga. Laws, p. 1135 (increasing the penalty for stirring up civil rights litigation from a misdemeanor to a felony).	Legal authority.
103	1960 Ga. Laws, p. 142 (making it a crime to refuse to leave the premises of an establishment after being requested to do so by the owner).	Legal authority.
104	1961 Ga. Laws, pp. 31-35 (authorizing local referenda to close public schools).	Legal authority.
105	1961 Ga. Laws, pp. 35-38 (establishing tuition grants to enable "school children to attend private schools of their choice in lieu of public schools").	Legal authority.
106	1961 Ga. Laws, p. 595 (proposed constitutional amendment that "[f]reedom from compulsory association at all levels of public education shall be preserved inviolate").	Legal authority.
107	1962 Ga. Laws Exec. Sess., p. 30 (adopting countywide voting for state senators in counties with more than one senator and imposing a majority vote requirement).	Legal authority.
108	Georgia House Journal, Feb. 5, 1964, p. 680; Feb. 10, 1964, p. 896 (condemning the proposed Civil Rights Act of 1964 as a "diabolical attempt to usurp" the rights of citizens).	Legal authority; completeness.
109	H. Journal, Exec. Sess., p. 876 (Ga. June 16, 1964) (calling the one person, one vote decision in Reynolds v. Sims "the saddest day in American history").	Legal authority.
110	1964 Ga. Laws Exec. Sess., pp. 49-50 (prohibition against registrar and deputy registrar seeking office or nomination for six months after serving as registrar).	Legal authority.
111	1964 Ga. Laws Exec. Sess., p. 49 (giving local registrars total discretion in appointment of deputy registrars).	Legal authority.
112	1964 Ga. Laws Exec. Sess., p. 57 (adopting a literacy test for voting).	Legal authority.
113	1964 Ga. Laws Exec. Sess., pp. 58-60 (adopting a more stringent and discriminatory good character and understanding test for voting).	Legal authority.
114	1964 Ga. Laws Exec. Sess., pp. 174-75 (adopting a statewide majority vote requirement).	Legal authority.
115	1964 Ga. Laws Exec. Sess., p. 89 (adopting a statewide numbered post provision).	Legal authority.
116	1968 Ga. Laws, pp. 903-04 (purge law).	Legal authority.
117	1968 Ga. Laws, pp. 899-900 (requirement that registration be conducted only at specifically designated, stationary locations).	Legal authority.
118	1968 Ga. Laws, pp. 977-78 (majority vote requirement for municipal elections).	Legal authority.
119	1968 Ga. Laws, pp. 913-14 (requiring a designated post system for multiple seat municipal elections).	Legal authority.
120	1970 Ga. Laws, pp. 380-83 (majority vote requirement for elected office).	Legal authority.
121	1970 Ga. Laws, pp. 369-70 (requiring a designated post system for multiple seat elections).	Legal authority.

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122	Ga. Const. of 1976, art. II, §1, para. III, §§ 1, 2 (carrying forward the traditional literacy test combined with a "good character and understanding" test; the effect of this provision was suspended in Georgia by operation of the Voting Rights Act of 1965).	Legal authority; completeness.
123	Ga. Code Ann. § 34-605 (1976) (requirement that chief registrar be a freeholder).	Legal authority.
124	1976 Ga. Laws, p. 1301 (providing that "[f]reedom from compulsory association at all levels of public education shall be preserved inviolate.").	Legal authority.
125	Bryan v. Walton, 14 Ga. 185, 198 (1853) ("the status of the African in Georgia, whether bond or free, is such that he has no civil, social or political rights or capacity, whatever, except such as are bestowed on him by Statute").	Legal authority.
126	Wolfe v. Georgia Ry. & Electric Co., 58 S.E. 899, 901 (Ga. Ct. App. 1907) ("We take judicial notice of an intrinsic difference between the two races.").	Legal authority.
127	King v. Chapman, 62 F. Supp. 639, 650 (M.D. Ga. 1945) (finding the refusal to allow a black person to vote in Georgia's white Democratic primary to be in violation of the Fourteenth and Fifteenth Amendments).	Legal authority.
128	Reece v. Georgia, 350 U.S. 85, 87 (1955) (reversing the dismissal of a jury discrimination claim and noting that "no Negro had served on the grand jury in Cobb County for the previous 18 years").	Legal authority.
129	Thornton v. Martin, 1 Race Relations L. Rptr. 213, 215 (M.D. Ga. Nov. 23, 1956) (the removal of black voters from the rolls in Randolph County "constituted an illegal discrimination against them on account of their race and color," and ordering their restoration to the voter rolls).	Legal authority.
130	Harris v. Echols, 146 F. Supp. 607, 610 (S.D. Ga. 1956) (noting the purging of blacks from the voter rolls in Pierce County because they lacked "understanding [of] the Constitution or the duties of citizenship that is required by law").	Legal authority.
131	Grand Jury Presentments re Koinonia Farms, Inc., a biracial communal group operating a farm and selling farm products near Americus, Georgia, 2 Race Relations L. Rptr. 682, 684, 686 (Ga. Apr. 15, 1957) (in its report to the court the grand jury concluded that residents of Koinoni a had themselves dynamited their roadside stand, burned down one of their houses, and committed other acts of violence for purposes of "propaganda" and "pecuniary gain," and that while "the evidence is insufficient to convict of Communism in a Court of Law . . . there exists	Legal authority.
132	United States v. Raines, 362 U.S. 17, 19, 25 (1960) (rejecting arguments by registration officials in Terrell County that the Civil Rights Act of 1957, which forbids racial intimidation and coercion in voting, was unconstitutional, and reversing the dismissal of a suit against the officials who were alleged to have discriminated on racial grounds against Negroes who desired to register to vote).	Legal authority.
133	United States v. Raines, 189 F. Supp. 121, 125, 127, 129-30, 132, 135 (M.D. Ga. 1960) (finding that Terrell County registration officials "engaged in acts and practices which deprive[d] Negro citizens" of the right to vote and permanently enjoining them for continuing their discriminatory practices, noting that while the county was 64% black, only 48 blacks—compared to 2,810 whites—were registered to vote in 1958).	Legal authority.
134	Wood v. Georgia, 370 U.S. 375, 379, 395 (1962) (reversing the conviction of a Bibb County sheriff of contempt of court for criticizing a grand jury investigation of "negro block voting").	Legal authority.
135	Anderson v. Courson, 203 F. Supp. 806, 809-10 (M.D. Ga. 1962) (holding unconstitutional "segregation in voting places" in Albany and Dougherty County; blacks voted in the city auditorium and whites in the county courthouse).	Legal authority.
136	United States v. Bibb County Democratic Executive Committee, 222 F. Supp. 493, 494-95, 499 (M.D. Ga. 1962) (finding segregated voting in Bibb County in violation of the Fourteenth and Fifteenth Amendments, i.e., requiring segregated polling places, segregated voting machines, and publication of election returns on a racially designated basis).	Legal authority.
137	Harris v. Chappell, 8 Race Relations L. Rptr. 1355, 1356-57 (M.D. Ga. 1963) (finding unconstitutional Georgia's insurrection statute under which four civil rights activists were being held by the Sheriff of Sumter County without bail and ordered them released on bail, and citing Herndon v. Lowry, 301 U.S. 242 (1937), and Wright v. Georgia, 373 U.S. 284 (1963)).	Legal authority.
138	United States v. Jones County Democratic Executive Committee, 8 Race Relations L. Rptr. 1091, 1092-93 (M.D. Ga. 1963) (invalidating segregated voting in Jones County).	Legal authority.
139	Allen v. State, 110 Ga. App. 56, 57-58 (Ga. Ct. App. 1964) (the evidence showed that all the persons on the grand and trial jury lists for the Sumter County Superior Court were white and that the tax digests from which the names were drawn were racially segregated).	Legal authority.

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140	Whitus v. Balkcom, 333 F.2d 496, 498 (5th Cir. 1964) (finding that: "No Negro has ever served on a grand jury or on a petit jury in Mitchell County.").	Legal authority.
141	United States v. Mathews, 9 Race Relations L. Rptr. 225, 226-27 (M.D. Ga. Jan. 27, 1964) (enjoining the Terrell County Sheriff and other county officials from intimidating or prosecuting persons to prevent them from registering or voting).	Legal authority.
142	Heart of Atlanta Motel, Inc. v. United States, 231 F. Supp. 393, 396 (N.D. Ga. 1964) (rejecting a claim that the Civil Rights Act of 1964 was unconstitutional, and enjoining racial segregation in the Heart of Atlanta Motel).	Legal authority.
143	Willis v. Pickrick Restaurant, 231 F. Supp. 396, 401-02 (N.D. Ga. 1964) (rejecting defendants' claim that the Civil Rights Act of 1964 was unconstitutional, and enjoining racial segregation in an Atlanta restaurant owned by soon-to-be governor Lester Maddox).	Legal authority.
144	Gamble v. Grimes, 11 Race Relations L. Rptr. 2028 (N.D. Ga. 1966) (finding discrimination in jury selection in Harris County; blacks were 57% of the population but in 1955 there were no blacks on the grand jury list and only 2.3% on the trial jury list; and ordering that petitioner be granted a new trial).	Legal authority.
145	Bond v. Floyd, 385 U.S. 116, 137 (1966) (holding that Julian Bond, a civil rights activist, had been unlawfully excluded from the Georgia legislature in violation of his "right of free expression under the First Amendment").	Legal authority.
146	Bell v. Southwell, 376 F.2d 659, 660-61, 664 (5th Cir. 1967) (setting aside an election in Sumter County because of "gross, unsophisticated, significant, and obvious racial discrimination," including segregated voting lists and polling booths, intimidation of black voters by whites, and the arrest of black voters attempting to vote in white polling booths).	Legal authority.
147	Sims v. Georgia, 389 U.S. 404, 407-08 (1967) (finding blacks had been unconstitutionally excluded from juries in Charlton County).	Legal authority.
148	Pullum v. Greene, 396 F.2d 251, 252, 255 (5th Cir. 1968) (finding that prior to 1966 no blacks were included on jury lists in Terrell County).	Legal authority.
149	Jones v. Smith, 420 F.2d 774, 777 (5th Cir. 1969) (finding "an impermissible disparity in the racial composition" of lists from which juries were drawn in Fulton County).	Legal authority.
150	Turner v. Fouche, 396 U.S. 346, 351 (1970) (finding that in majority black Taliaferro County only 11 blacks were on the 130 member grand jury list).	Legal authority.
151	Edwards v. Sammons, 437 F.2d 1240, 1241 (5th Cir. 1971) (noting the purging of 150 black residents of Fort Valley in Peach County from the voter rolls for failure to pay city taxes, alleged to be in violation of the Fourteenth Amendment).	Legal authority.
152	Broadway v. Culpepper, 439 F.2d 1253, 1259-60 (5th Cir. 1971) (finding a disparity between the black population and the percentage of blacks on the jury list in Baker County).	Legal authority.
153	United States v. Georgia, 351 F. Supp. 444, 446-47 (N.D. Ga. 1972) (enjoining enforcement of a Georgia house redistricting plan because it incorporated features to which DOJ had previously objected under Section 5 of the Voting Rights Act, 52 U.S.C. § 10304 (formerly 42 U.S.C. § 1973c), i.e., multi-member districts, numbered post requirements, and majority runoffs).	Legal authority.
154	Georgia v. United States, 411 U.S. 526, 535 (1973), abrogated, Shelby County v. Holder, 133 S. Ct. 2612 (2013) (affirming the decision in United States v. Georgia, 351 F. Supp. 444 (N.D. Ga. 1972), and rejecting the state's claim that Section 5 of the Voting Rights Act was now unconstitutional).	Legal authority.
155	Bond v. White, 508 F.2d 1397, 1398-99 (5th Cir. 1975) (DOJ objected under Section 5 to a change in the method of electing the Twiggs County Commission from districts to at-large, but the county proceeded to hold elections under the objected-to procedure until enjoined by the federal court).	Legal authority.
156	Foster v. Sparks, 506 F.2d 805, 808 (5th Cir. 1975) (finding that "black and female citizens in Quitman County have long been greatly underrepresented in the organs of county government," including service on grand and trial juries).	Legal authority.

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157	Pitts v. Busbee, 395 F. Supp. 35, 39-41 (N.D. Ga. 1975), vacated, Pitts v. Cates, 536 F.2d 56 (5th Cir. 1976)(a challenge to at-large elections in Fulton County in which the court found: there was "a history of undisputable, pervasive de jure racial segregation in Georgia and Fulton County"; "the Fulton County government has never become equally open to participation by black and white members of the community"; no black person had ever been elected to the county commission under the challenged plan; the county had refused for racial reasons to build public housing or permit anyone else to do so; there were no black department heads; virtually every suspect voting procedure was in effect, including majority vote and numbered post requirements; at-large elections in Fulton County "grossly minimize" the possibility of blacks electing candidates of their choice; noting the "racist campaign tactics" used against Andrew Young by his white opponent in their 1970 congressional campaign).	Legal authority.
158	Thomasville Branch of NAACP v. Thomas County, Civ. No. 75-34 (M.D. Ga.) (successful challenge to at-large elections in Thomas County).	Legal authority.
159	Howard v. Board of Commissioners of Walton County, Civ. No. 75-67-ATH (M.D. Ga. July 29, 1976) (successful challenge to at-large elections in Walton County).	Legal authority.
160	Bowdry v. Hawes, Civ. No. 176-128 (S.D. Ga. 1978) (successful challenge to at-large elections for McDuffie County Commission; adoption of at-large elections for McDuffie County board of education found in violation of Section 5; successful challenge to at-large elections in Thomon).	Legal authority.
161	Butler v. Underwood, Civ. No. 76-53 (M.D. Ga., Dec, 14, 1978)(successful challenges to at-large elections in Morgan County and the city of Madison).	Legal authority.
162	Berry v. Doles, 438 U.S. 190 (1978) (remanding for consideration of a remedy for Peach County's implementation of a voting change without first seeking Section 5 preclearance).	Legal authority.
163	Holloway v. Faust, Civ. No. 76-28 (M.D. Ga.) (successful challenge to at-large voting for Terrell County commission).	Legal authority.
164	Merritt v. Faust, Civ. No. 76-28-AMER (M.D. Ga. July 21, 1978) (adoption of at-large elections for Terrell County board of education found to be in in violation of Section 5).	Legal authority.
165	Holloway v. Raines, Civ. No. 77-27-Amer (M.D. Ga. Feb. 1, 1979) (successful suit challenging at-large elections for the City of Dawson).	Legal authority.
166	Cross v. Baxter, Civ. No. 76-20 (M.D. Ga. July 24, 1984) (successful challenge to at-large elections in Moultrie). See also Cross v. Baxter, 604 F.2d 875, 880 n.8 (5th Cir. 1979) (finding racially polarized voting in Moultrie, Georgia).	Legal authority.
167	Sullivan v. DeLoach, Civ. No. 176-238 (S.D. Ga. Sept. 22, 1977) (successful challenge to at-large elections in Waynesboro).	Legal authority.
168	McIntosh County NAACP v. McIntosh County, Civ. No. 277-70 (S.D. Ga.) (successful challenge to at-large elections in McIntosh County).	Legal authority.
169	Wilkerson v. Ferguson, Civ. No. 77-30 (M.D. Ga. April 7, 1980) (successful challenge to at-large elections for Sumter County Commission; successful challenge to at-large elections in Americus).	Legal authority.
170	McIntosh County Branch of NAACP v. City of Darien, Civ. No. 277-71 (S.D. Ga.) (successful challenge to at-large elections in Darien, following reversal and remand in McIntosh County Branch of NAACP v. City of Darien, 605 F.2d 753 (5th Cir. 1979)).	Legal authority.
171	Paige v. Gray, 437 F. Supp. 137, 153-58 (M.D. Ga. 1977) (successful challenge to at-large elections in Albany, in which the court found that: the city functioned "in every respect . . . as a racially segregated community"; schools, voting, the library, the city auditorium, tennis courts, swimming pools, public housing, juries, municipal employment, taxicabs, theaters, and city busses were segregated; the Democratic party was "in the hands of an all-white committee"; the black community "has just never had the opportunity or been permitted to enter into the political process of electing city commissioners"; the at-large system was "winner take all" and was "invidiously discriminatory" in violation of the Fourteenth and Fifteenth Amendments).	Legal authority.
172	Barrow v. State, 239 Ga. 162, 167 (1977) (the grand and trial juries in Oglethorpe County were "illegally constituted" because they "overrepresented . . . white males").	Legal authority.
173	Berry v. Cooper, 577 F.2d 322, 324 (5th Cir. 1978) (recognizing that jury lists in Peach County "were unconstitutionally composed" and discriminated on the basis of race and sex).	Legal authority.

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174	Wilkes County, Georgia v. United States, 450 F. Supp. 1171, 1174-76 (D.D.C. 1978) (denying Section 5 preclearance to at-large elections in Wilkes County because of their discriminatory purpose and effect, and finding "racial bloc voting exists in the county," "past discrimination in voting against black residents," and "the virtual total control of the electoral process by white persons").	Legal authority.
175	Mann v. Cox, 487 F. Supp. 147, 155 (S.D. Ga. 1979) (finding "discrimination in jury selection" against women and blacks in Bulloch County).	Legal authority.
176	Love v. Deal, Civ. No. 679-37 (S.D. Ga. May 27, 1980; April 7, 1983; May 26, 1983) (successful challenge to at-large elections for Bulloch County Commission; adoption of at-large elections for Bulloch County School Board found in violation of Section 5; successful challenge to at-large elections in Statesboro).	Legal authority.
177	Jones v. Cowart, Civ. No. 79-79 (M.D. Ga. June 11, 1980) (successful challenge to at-large elections in Calhoun County).	Legal authority.
178	McKenzie v. Dooly County, Georgia, Civ. No. 86-95 (M.D. Ga. Sept 29, 1986) (successful challenge to malapportioned plan for the Dooly County Commission and which also under represented blacks).	Legal authority.
179	Head v. Henry Board of Commissioners, Civ. No. 79-2063A (N.D. Ga. June 17, 1980) (successful challenge to at-large elections in Henry County).	Legal authority.
180	Cochran v. Autry, Civ. No. 79-59 (M.D. Ga. May 17 and 21, 1984) (successful challenge to at-large elections for Mitchell County Commission and Board of Education).	Legal authority.
181	McRae v. Board of Education of Henry County, 491 F. Supp. 30 (N.D. Ga. 1980) (enjoining further use of at-large elections for Henry County school board for failure to seek preclearance under Section 5).	Legal authority.
182	Davenport v. Isler, Civ. No. 80-42 (M.D. Ga. June 23, 1980) (enjoining use of at-large elections for the Clay County Commission for failure to seek preclearance under Section 5).	Legal authority.
183	City of Rome v. United States, 446 U.S. 156, 161 (1980), abrogated, Shelby County v. Holder, 133 U.S. 2612 (2013) (denied preclearance under Section 5 to the city's majority vote, numbered posts, staggered terms requirements, and annexations because of their discriminatory effect given the predominance of racial bloc voting, and rejected the city's claim that Section 5 was unconstitutional).	Legal authority.
184	NAACP, DeKalb County Chapter v. Georgia, 494 F.Supp. 668, 679 (N.D. Ga. 1980) (enjoining new county policy prohibiting neighborhood registration drives in DeKalb County absent preclearance under Section 5).	Legal authority.
185	Brown v. Scarborough, Civ. No. 80-27 (M.D. Ga. 1980) (successful challenge to at-large elections in Early County).	Legal authority.
186	Boddy v. Hall, Civ. No. 82-406 (M.D. Ga. May 1984) (successful challenges to at-large elections for the Baldwin County commission and board of education).	Legal authority.
187	Hughley v. Adams, 667 F.2d 25 (11th Cir. 1982) (a remedial districting plan adopted by the Pike County school board could not be implemented absent preclearance under Section 5).	Legal authority.
188	Lodge v. Buxton, 639 F.2d 1358, 1376-79 (5th Cir. Unit B 1981) (successful challenge to at-large elections in Burke County, in which the court found: there was discrimination in employment, the provision of services, and appointments to boards and commissions; schools and juries were segregated; public funds were diverted to support a private school established to circumvent desegregation; blacks had a depressed socio-economic status; "Black suffrage was 'virtually non-existent'"; blacks were excluded from participating in the affairs of the Democratic party; and the evidence of racial bloc voting was "clear and overwhelming"), aff'd sub nom. Rogers v. Lodge, 458 U.S. 613, 622 (1982) (affirming the "District Court's finding that the at-large system in Burke County was being maintained for the invidious purpose of diluting the voting strength of the black population").	Legal authority.
189	Robinson v. Kimbrough, 652 F.2d 458, 460 (5th Cir. 1981) (finding that in 1974 the population of Harris County was approximately 40% to 45% percent black and 50% female, but from 1969 to 1974 the percentages of blacks on the jury lists was approximately 10% to 15% and for women was 0% to 2%).	Legal authority.
190	Searcy v. Williams, 656 F.2d 1003, 1010 & n.9 (5th Cir. Unit B 1981) (invalidating the self-perpetuating method of selecting members of the Thomaston school board because it "has clearly operated purposefully to further discrimination" in violation of the Fourteenth Amendment).	Legal authority.

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191	Bailey v. Vining, 514 F. Supp. 452, 454-62 (M.D. Ga. 1981) (successful challenge to at-large elections in the city of Eatonton, the Putnam County Commission, and Board of Education, in which the court found: voting was racially polarized; schools and juries had been segregated; few blacks were employed by the city or county or had been appointed to local boards and commissions; the municipal housing authority was operated on a racially segregated basis; the swimming pool was white-only until 1968; public funds had been used to pave the road to an all-white private school, which opened following the desegregation of public schools; the golf course, operated on land owned by the county, was segregated; voting lists were maintained on a segregated basis; no blacks were appointed as deputy registrars until after the law suit was filed in 1976, and there were virtually no black election officials in the city and rural precincts; blacks were excluded from participating in the affairs of the Democratic party; majority vote and numbered post requirements were in effect; blacks had a depressed socio-economic status which hindered their ability to support candidates for public office; despite the fact that blacks were 49% of the population, no black had ever won a contested at-large election in the county in the present century; blacks "have not had equal access to the political processes in Putnam County").	Legal authority.
192	Edge v. Sumter County School District, 541 F. Supp. 55, 56 (M.D. Ga. 1981) ("On July 13, 1973 the Attorney General interposed an objection to the change [to at-large elections for the board of education]. In spite of this objection the at-large system has been utilized for Board elections up to the present time."), aff'd, Sumter County School District v. Edge, 456 U.S. 1002 (1982).	Legal authority.
193	Edge v. Sumter County School District, 775 F.2d 1509 (11th Cir. 1985) ("No black person has ever served on the county school board"; "In 1964, prior to the Voting Rights Act, Georgia law provided that the Sumter County grand jury appoint school board members.").	Legal authority.
194	Busbee v. Smith, 549 F. Supp. 494, 500, 517 (D.D.C. 1982) (noting that Georgia's 1970 congressional reapportionment plan fragmented concentrations of black voters and discriminated against potential black candidates; denied preclearance to Georgia's 1980 congressional plan and finding that "the divergent utilization of the 'community of interest' standard is indicative of racially discriminatory intent," and that the chair of the house reapportionment committee, Joe Mack Wilson, "is a racist").	Legal authority.
195	Birt v. Montgomery, 709 F.2d 690, 699 (11th Cir. 1983) (the statistics show "an absolute disparity of underrepresentation" of blacks and women on the jury pool lists in Jefferson County).	Legal authority.
196	Concerned Citizens for Better Government for Evans County v. DeLoach, Civ. No. 483-343 (S.D. Ga. Jan. 13, 1984) (successful challenge to at-large elections in Evans County).	Legal authority.
197	Concerned Citizens for Better Government for Evans County v. DeLoach, Civ. No. 483-343 (S.D. Ga. Apr. 18, 1984; July 27, 1984) (successful challenges to at-large elections in Claxton and Hagan).	Legal authority.
198	Tomlin v. Jefferson County Board of Commissioners, Civ. No. 683-23 (S.D. Ga. Sept. 1983) (successful challenge to at-large elections in Jefferson County).	Legal authority.
199	United States v. Lowndes County, Civ. No. 83-106 (M.D. Ga.) (successful challenge to at-large elections in Lowndes County and the city of Valdosta). A similar challenge to at-large elections for Valdosta was also filed by the NAACP, Lowndes County Chapter of NAACP v. Tillman, Civ. No. 83-108-VAL (M.D. Ga.).	Legal authority.
200	Mims v. Tift County, Civ. No. 83-9 (M.D. Ga.) (successful challenge to at-large elections in Tift County).	Legal authority.
201	Wilson v. Powell, Civ. No. 383-14 (S.D. Ga. Oct. 1984) (successful challenge to the grand jury method of appointing members of the Johnson County school board and the adoption of single member districts).	Legal authority.
202	Brown v. Bailey, Civ. No. 84-223 (M.D. Ga.) (successful challenge to at-large elections for Butts County Commission; successful challenge to at-large elections in Jackson).	Legal authority.
203	Baker v. Gay, Civ. No. 284-37 (S.D. Ga. Oct. 7, 1985) (successful challenge to at-large elections for the Camden County commission and board of education).	Legal authority.
204	Cook County Voter Education Project v. Walker, Civ. No 84-044 (M.D. Ga. July 11, 1985) (at-large elections adopted for Cook County school board found in violation of Section 5).	Legal authority.
205	Raines v. Hutto, Civ. No. 84-321 (M.D. Ga.) (successful challenge to at-large elections for the Crawford County commission and board of education).	Legal authority.
206	Reid v. Martin, Civ. No. 84-60 (N.D. Ga. 1985) (successful challenge to at-large elections for the Spalding County board of commissioners and the Griffin city council).	Legal authority.
207	Carter v. Tootle, Civ. No. 484-219 (S.D. Ga. Oct. 1984) (successful challenge to at-large elections in Tattnall County).	Legal authority.

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208	Brown v. City of Camilla, Civ. No. 84-248 (M.D. Ga.) (successful challenge to at-large elections in Camilla).	Legal authority.
209	Carrollton Branch of NAACP v. Stallings, Civ. No. 84-122-6 (N.D. Ga. Sept. 17, 1988) (successful challenge to at-large elections in Carroll County). See also Carrollton Branch of NAACP v. Stallings, 829 F.2d 1547, 1559, 1560, 1563 (11th Cir. 1987) (noting that "no black has ever been elected to any county office in Carroll County"; that there was evidence the system had been adopted with a discriminatory purpose; and "that there [wa]s substantial evidence in the record to indicate that Carroll County experiences racially polarized voting in county-wide elections").	Legal authority.
210	Rush v. Norman, Civ. No. 84-150 (N.D. Ga.) (successful challenge to at-large elections in Newnan).	Legal authority.
211	McCoy v. Adams, Civ. No. 84-240 (M.D. Ga. Nov. 14, 1986) (successful challenges to at-large elections in Camilla and Pelham).	Legal authority.
212	Dantley v. Sutton, Civ. No. 84-165 (M.D. Ga. April 18, 1986) (successful challenge to at-large elections in Rochelle).	Legal authority.
213	Ware County Voter Education Project v. Parks, Civ. No. 584-070 (S.D. Ga.) (successful challenge to at-large elections in Waycross).	Legal authority.
214	Keebler v. Burch, Civ. No. 284-26 (S.D. Ga. May 22, 1984) (at large elections adopted for Wayne County school board found in violation of Section 5).	Legal authority.
215	Meriwether County Voter Education Project v. Hicks, Civ. No. 84-117-N (N.D. Ga. Sept. 28, 1984) (at-large elections adopted for Meriwether County school board found in violation of Section 5).	Legal authority.
216	Toombs County Branch of NAACP v. Culpepper, Civ. No. 84-21 (S.D. Ga. Dec. 12, 1986) (at-large elections adopted for Toombs County school board found in violation of Section 5).	Legal authority.
217	Smith v. Carter, Civ. No. 585-088 (S.D. Ga. Mar. 31, 1986) (successful challenge to at-large elections for the Charlton County commission and school board).	Legal authority.
218	Bacon v. Higdon, Civ. No. 85-40 (M.D. Ga. Jan. 10, 1986) (successful Section 2 challenge to at-large elections for the Greene County commission and school board).	Legal authority.
219	McBride v. Marion County Commission, Civ. No. 99-CV-134 (M.D. Ga. June 13, 2000) (successful challenge to at-large elections for the Marion County commission. Among the court's findings were: "Racially polarized voting prevails in elections in the county"; "no black candidate has been elected to any county office in Marion County in which voting occurs on an at-large basis"; "Black citizens in Georgia and its political subdivisions (including Marion County) have suffered from a history of official racial discrimination in voting and other areas.").	Legal authority.
220	Simmons v. Monroe County Commission, Civ. No. 85-125 (M.D. Ga.) (successful challenge to at-large elections in Monroe County).	Legal authority.
221	Smith v. Gillis, Civ. No. 385-42 (S.D. Ga. April 1986) (successful Section 2 challenge to at-large elections for the Treutlen County commission and board of education, and the Soperton city council.).	Legal authority.
222	Hall v. Holder, 757 F. Civ. No. 85-242 (M.D. Ga 1991.) (successful challenge to at-large elections in Cochran).	Legal authority.
223	Hall v. Holder, 955 F.2d 1563, 1572-74 (11th Cir. 1992) (finding "racially polarized voting" in Bleckley County and that Bleckley County "had deprived blacks of the opportunity to participate in public life and government, even prohibiting blacks from registering to vote and from voting"),rev'd on other grounds sub nom. Holder v. Hall, 512 U.S. 874 (1994).	Legal authority.
224	Strickland v. Lamar County Board of Commissioners, Civ. No. 86-167 (M.D. Ga.) (challenge to at-large elections for the Lamar County commission and board of education).	Legal authority.
225	Chatman v. Spillers, Civ. No. 86-91 (M.D. Ga. June 1992) (successful challenge to at-large elections in Butler). See also Chatman v. Spillers, 44 F. 3d 923, 925 (11th Cir. 1995) (ordering the district court to "order special elections within thirty (30) days from the issuance of the mandate in this case in the manner suggested by the plaintiffs.").	Legal authority.
226	Freeze v. Jesup, Civ. No. 286-128 (S.D. Ga.) (successful challenge to at-large elections in Jesup).	Legal authority.
227	Maxwell v. Moore, Civ. No. 686-024 (S.D. Ga.) (successful challenge to at-large elections in Lyons).	Legal authority.
228	Glover v. Long County, Civ. No. 287-20 (S.D. Ga. April 1987) (successful Section 2 challenge to at-large elections for the Long County commission).	Legal authority.
229	Teague v. Wilcox County, Civ. No. 87-80 (M.D. Ga. July 30, 1987) (successful challenge to at-large elections in Wilcox County).	Legal authority.
230	United States v. City of Augusta, Civ. No. 187-004 (S.D. Ga. 1989) (successful challenge to at-large elections in Augusta).	Legal authority.

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231	Woodard v. Mayor and City Council of the City of Lumber City, Georgia, Civ. No. 387-027 (S.D. Ga. Aug 3, 1990) (successful Section 2 challenge to at-large elections in City of Lumber City). See also Woodard v. Mayor and City Council of the City of Lumber City, Georgia, 676 F. Supp. 255 (S.D. Ga. 1987) (enjoining use of a 1973 majority voter law for failure to get preclearance under Section 5).	Legal authority.
232	Brown v. McGriff, Civ. No. 387-019 (S.D. Ga. Aug. 1,1988) (successful Section 2 challenge to at-large elections in Eastman).	Legal authority.
233	Wallace v. City of Ludowici, Civ. No. 287-147 (S.D. Ga.) (successful Section 2 challenge to at-large elections in Ludowici).	Legal authority.
234	Warren County Branch of NAACP v. Haywood, Civ. No. 187-167 (S.D. Ga.) (successful challenge to at-large elections in Warrenton).	Legal authority.
235	Clark v. Telfair County, Civ. No. 287-25 (S.D. Ga. Oct. 26, 1988) (successful challenge to at-large elections for Telfair County sole commissioner).	Legal authority.
236	Amadeo v. Zant, 486 U.S. 214, 218, 224 (1988) (finding that Putnam County officials intentionally underrepresented black people and women on grand and trial juries).	Legal authority.
237	Neely v. Webster County, Civ. No. 88-203 (M.D. Ga. March 16, 1990) (settling a challenge to the sole commissioner form of government in Webster County by increasing the size of the county government with elections from districts).	Legal authority.
238	Brooks v. State Board of Elections, 848 F. Supp. 1548, 1560 (S.D. Ga. 1994) (“Georgia has a history chocked full of racial discrimination at all levels. This discrimination was ratified into state constitutions, enacted into state statutes, and promulgated in state policy. Racism and race discrimination were apparent and conspicuous realities, the norm rather than the exception.”).	Legal authority.
239	Johnson v. Miller, 864 F. Supp. 1354, 1379 (S.D. Ga. 1994) (“we have given formal judicial notice of the State’s past discrimination in voting, and have acknowledged it in the recent cases”).	Legal authority.
240	Johnson v. Miller, 922 F. Supp. 1556, 1568, 1570-71 (S.D. Ga. 1995) (because of racial bloc voting a district containing “the percentage of black registered voters as close to fifty-five percent as possible was necessary . . . to avoid dilution of the Fifth District minorities' rights").	Legal authority.
241	Abrams v. Johnson, 521 U.S. 74, 107 (1997) (noting “Georgia’s long, well-documented history of past discrimination in voting”) (Breyer, Stevens, Souter, and Ginsburg, JJ., dissenting).	Legal authority.
242	Georgia v. Ashcroft, 195 F. Supp. 2d 25, 94 (D.D.C. 2002) (denying preclearance to two state senate districts finding, inter alia, “the presence of racially polarized voting”), vacated and remanded on other grounds, 539 U.S. 461 (2003).	Legal authority.
243	Letter from J. Stanley Pottinger, Assistant Attorney General, to Henry L. Crisp, Crisp & Oxford, July 13, 1973 (“the requirement that all candidates [for the Sumter County school board] must be voted on county-wide would result in the dilution and minimization of the voting strength of black citizens.").	
244	Letter form Wm. Bradford Reynolds, Assistant Attorney General, to Henry L. Crisp, Crisp, Oxford, & Gatewood, Dec. 17, 1982.	
245	Letter from Wm. Bradford Reynolds, Assistant Attorney General, to Henry L. Crisp, Crisp, Oxford, & Gatewood, Sept. 6, 1983.	
246	Consent Order filed Oct. 9, 1986, Edge v. Sumter County School District, Civ. No. 80-20-AMER (M.D. Ga.).	Legal authority.
247	Supplemental Order filed Oct. 9, 1986, Edge v. Sumter County School District, Civ. No. 80-20-AMER (M.D. Ga.).	Legal authority.
248	Letter from James M. Skipper, Jr., Gatewood, Skipper & Rambo, to T. Christian Herren, Jr., Chief of Voting Section, U.S. D.O.J., Jan. 19, 2012.	
249	Amended Final Judgment filed June 17, 1980, Wilkerson v. Ferguson, Civ. No. 77-30-AMER (M.D. Ga.).	Legal authority.
250	Second Amended Judgment filed June 16, 1980, Wilkerson v. Ferguson, Civ. No. 77-30-AMER (M.D. Ga.).	Legal authority.
251	Walter Rugaber, Americus Adds a Wrinkle in Racial Case Jailings, The Atlanta Journal, Oct. 3, 1963.	Legal authority; illegible.
252	Claude Sitton, Americus, Ga., Stifles Negro Drive, N.Y. Times, Sep. 29, 1963.	
253	Harris v. Chappell, 8 Race Relations L. Rptr. 1355 (M.D. Ga. 1963).	
254	Ga. Election Law Study Commission Mins., (Oct. 15-16, 1963).	
255	Letter from Ely Horne, Sumter County Superior Court Clerk, to Hon. Ben W. Fortson, Ga. Secretary of State, Oct. 18, 1963.	
256	Letter from Henry L. Crisp, University of Georgia, to Hon. Ben W. Fortson, Ga. Secretary of State, Nov. 1963.	

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Defendant's Objections to Plaintiff's Proposed Exhibits

257	Americus Negroes Prepare for Seige, The Atlanta Journal, July 28, 1965.	Illegible.
258	Walker Lundy, Negroes Reject Americus Panel, Atlanta Journal, Aug. 5, 1965.	Illegible.
259	Margaret Shannon, Racial Duress Studied by U.S., Atlanta Journal, Feb. 16, 1966.	
260	Ga. Advisory Committee to the United States on Civil Rights, Desegregation of Public School Districts in Georgia: A Fact-finding Report (Dec. 2007).	Completeness.
261	Defendant's Objections and Responses to the Plaintiff's Requests for Admissions (December 27, 2016).	
262	Defendant's Objections and Responses to the Plaintiff's Second Interrogatories (November 11, 2016).	
263	Defendant's Objections and Responses to the Plaintiff's Third Interrogatories (December 27, 2016).	
264	Deposition of Alice Green (February 13, 2017).	Plaintiff elected to call Ms. Green at trial and not rely on her deposition testimony or designations thereof.
265	Voter File - Part 1 & 2	
266	1968 GA Laws p. 2056	Legal authority.
267	1992 GA Laws p. 5171	Legal authority.
268	1973 GA Laws p. 2127	Legal authority.
269	1994 GA Laws p. 5108	Legal authority.
270	2002 GA Laws p. 3977	Legal authority.
271	2011 GA Laws p. 4020	Legal authority.
272	2011 GA Laws Extraord. Session p. 280	Legal authority.