

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

SUZANNAH HEIMEL,

Plaintiff,

v.

SHARON GREGG - DIRECTOR OF
BOARD OF ELECTIONS and JAY
HANLEY - CHAIRMAN OF BOARD OF
ELECTIONS,

Defendants.

CIVIL ACTION NO. SUSR2024000058-LL

**ANSWER OF INTERVENOR
COMMON CAUSE GEORGIA**

Intervenor Common Cause Georgia (“Common Cause”), by and through its attorneys, submits the following Answer to Plaintiff’s Application for Writ of Mandamus (the “Application”) and Cross-Claims. Common Cause responds to the allegations in the Application as follows.

ANSWER

1. Unnumbered Paragraph 1 of the Application appears to state that Defendant Sharon Gregg took actions against Plaintiff, including those set forth in subparagraphs 1-3. Common

the truth of this allegation. Unnumbered Paragraph 3 of the Application also states, “It is in clear violation of your duties as Director of Board of Election.” This allegation calls for a legal conclusion to which no response is required. To the extent a further response is deemed required, Common Cause denies the allegation.

7.

FOURTH AFFIRMATIVE DEFENSE

Plaintiff's claims are barred because she lacks the requisite clear legal right to relief in order for a writ of mandamus to issue.

FIFTH AFFIRMATIVE DEFENSE

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Counsel for Susan Noakes

*motion for admission *pro hac vice*
forthcoming

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SUZANNAH HEIMEL,)	
)	
Plaintiff,)	
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v.)	CIVIL ACTION NO. SUSR2024000058-LI
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SHARON GREGG - DIRECTOR OF)	
BOARD OF ELECTIONS and JAY)	
HANLEY - CHAIRMAN OF BOARD OF)	
ELECTIONS,)	
)	
Defendant.)	
)	

CERTIFICATE OF SERVICE

I hereby certify that, on October 4, 2024, the foregoing was served upon the following persons by electronic mail and the Court's electronic service delivery to:

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/s/ Jeremy Burnette
Jeremy Burnette (GA Bar No. 142467)