### IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA

MATHIS KEARSE WRIGHT, JR.,

Plaintiff,

٧.

CIVIL ACTION NO. 1:14-CV-42 (WLS)

SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION,

Defendant.

# SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION'S MOTION FOR SUMMARY JUDGMENT

COMES NOW the Sumter County Board of Elections and Registration (the County), Defendant in the above-styled case, and pursuant to Fed. R. Civ. P. 56 and Local Civil Rule 56, moves this Court for summary judgment in its favor. As shown by the attached Brief in Support of Sumter County Board of Elections and Registration's Motion for Summary Judgment, the Exhibits attached to and filed with that Brief, and the deposition testimony filed contemporaneously herewith, there are no material issues of fact in dispute and, as a matter of law, the County is entitled to summary judgment on Plaintiff's claims.

WHEREFORE, County Defendants respectfully request that this Court enter summary judgment in their favor and cast all costs against Plaintiff.

Respectfully submitted this 12th day of January, 2015.

s/ Anne W. Lewis
Anne W. Lewis
Georgia Bar No. 737490
Bryan P. Tyson
Georgia Bar No. 515411
STRICKLAND BROCKINGTON LEWIS LLP

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Attorneys for Defendant Sumter County Board of Elections and Registration

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Plaintiff,

v.

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SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION,

Defendant.

#### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day electronically filed the within and foregoing SUMTER COUNTY BOARD OF ELECTIONS AND REGISTRATION'S MOTION FOR SUMMARY JUDGMENT with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Laughlin McDonald, Esq. 2700 International Tower 229 Peachtree Street, NE Atlanta, GA 30303

Chara F. Jackson, Esq. 1900 The Exchange Suite 425 Atlanta, GA 30339

This 12th day of January, 2015.

s/ Anne W. Lewis Anne W. Lewis Georgia Bar No. 737490