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

JOSE MORALES, on behalf of himself and those similarly situated, NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE (NAACP), as an organization; GEORGIA ASSOCIATION OF LATINO ELECTED OFFICIALS (GALEO), as an organization; and THE CENTER FOR PAN ASIAN COMMUNITY SERVICES (CPACS), as an organization,	)	
Plaintiffs,	)	
V	)	
KAREN HANDEL, in her official capacity as Georgia Secretary of State,	)	**CIVIL ACTION NO. 1:08-CV-3172 JTC**
Defendant.	)	

PROPOSED DISCOVERY AND
BRIEFING SCHEDULE AND STATUS REPORT

The parties have been unable to agree upon a Final Order. Pursuant to this Court's order dated July 21, 2009, the parties submit the following Proposed Discovery and Briefing Schedule and Status Report.

Since the date of the Status Conference, which was held on July 21, 2009, the Secretary of State has made the decision to seek reconsideration of the Department of Justice's ("DOJ") objection to the citizenship verification

process.[1] Counsel for Defendant notified Plaintiffs' counsel of this decision today. The Secretary is in the process of preparing her request for reconsideration and will submit that request to DOJ as quickly as possible. The Secretary will provide a copy of her submission to Plaintiffs at the same time that it is submitted to DOJ.

Prior to the parties agreeing to a stay of proceedings in this matter, Defendant had served Plaintiffs with written discovery in this matter. The parties therefore ask that the pending stay be modified to the extent that Plaintiffs shall respond to Defendant's outstanding discovery requests in advance of the initial briefs. Therefore, the parties propose the following discovery and briefing schedule.

1. Plaintiffs shall serve Defendant with their responses to Defendant's First Interrogatories and Request for Production of Documents on or before Friday, August 14, 2009.
2. The parties shall be permitted to file dispositive motions directed at the issues remaining before the court not later than Friday, August 28, 2009;

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[1] The Secretary will also be seeking reconsideration of DOJ's objection to the Secretary of State's verification program as it applies to verification of an applicant's name, date of birth, driver's license and social security numbers.

3. The parties shall file responsive briefs not later than Friday, September 11, 2009; and

4. The parties shall file reply briefs, if any, not later than Friday, September 18, 2009.

A proposed Order is attached for the Court's consideration.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that I have this the 4th day of August, 2009, electronically filed the foregoing **PROPOSED DISCOVERY AND BRIEFING SCHEDULE AND STATUS REPORT** with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all parties to this matter via electronic notification or otherwise, including the following:

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