

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

BRENDA BOHANAN,

Plaintiff,

vs.

DOUGLAS COUNTY COMMISSIONER
KELLY G. ROBINSON,
in his individual and official capacities,

Defendant.

JURY TRIAL DEMANDED

CIVIL ACTION NO.:

**PLAINTIFF’S BRIEF IN SUPPORT OF
MOTION FOR PRELIMINARY INJUNCTION**

In support of her motion for preliminary injunctive relief, Plaintiff Brenda Bohanan (“Plaintiff Bohanan” or “Plaintiff”) files this brief showing that she is entitled to an injunction requiring Defendant Douglas County Commissioner Kelly G. Robinson (“Defendant Robinson” or “Defendant”) to: (1) cease his unlawful practice of blocking Plaintiff from Defendant’s interactive social media Facebook pages based on viewpoint discrimination in violation of the First and Fourteenth Amendments of the United States Constitution; (2) unblock and provide access to Plaintiff to his Facebook page located at

<https://www.facebook.com/kellyrobinsonsr>, which Defendant uses to interact with, among others, members of the public regarding his activities or opinions as a government official; and (3) refrain from blocking Plaintiff or other commentators - or deleting their comments -- based on viewpoint-based or standard-less criteria from his Facebook page located at <https://www.facebook.com/kellyrobinsonsr> and from any further or future Facebook pages that Defendant uses to interact with the public regarding his activities or opinions as a government official.¹

FACTS SUPPORTING PRELIMINARY INJUNCTIVE RELIEF

Plaintiff Bohanan is a concerned and active Georgia citizen who has voiced criticism of Defendant Robinson in his capacity as a Douglas County Commissioner. Plaintiff Bohanan has a constitutional right and desire to have access to the designated or limited public forum created by Defendant Robinson for citizens on his interactive Facebook page. Plaintiff Bohanan has a right and desire to receive Defendant Robinson's speech and the speech of other constituents and citizens who post comments on Defendant's Facebook page relating to matters of public concern, including relating to Defendant in his capacity as Douglas County Commissioner. Plaintiff Bohanan also has a right and desire to use the interactive features of

¹ Plaintiff does not seek an immediate hearing on this motion in light of the ongoing COVID-19 emergency order. Plaintiff will work with Defendant's counsel and this court to establish a workable timeframe to address the issues raised in the Complaint and the motion.

Defendant's Facebook page to engage in constitutionally protected speech within this forum – i.e., to express her own beliefs and viewpoints relating to matters of public concern, including relating to Defendant Robinson in his capacity as Douglas County Commissioner. See Complaint (“Compl.”) at ¶¶ 7-10.

Defendant's Facebook Presence

Defendant Robinson maintains a Facebook page located at <https://www.facebook.com/commissionerkellyrobinsonofficial> (“Defendant's Official Page”) which is a designated or limited public forum from which Plaintiff is not blocked. Sometime before June 21, 2015, Defendant Robinson separately created the Facebook page that until on or about May 28, 2020 was located at <https://www.facebook.com/commissionerkelly.robinson> (“Facebook Page” or “the Page”), and which by the first quarter of 2020 had over 4900 associated “friends.” See Compl. at ¶¶ 11-12, Exhibit A.²

Interacting with constituents and the public on his Facebook Page, Defendant clearly identified himself as a Douglas County Commissioner, including by the fact that the Facebook Page displayed his name at the top of the page as “Commissioner Kelly Robinson” and by the fact that the URL for the Facebook Page included the

² Exhibits referenced herein are filed as attachments to Plaintiff's Verified Complaint.

word “commissioner” (<https://www.facebook.com/commissionerkelly.robinson>).
See Exhibit A; Compl. at ¶ 13.

Defendant posted on the Facebook Page about his work, opinions and activities as Douglas County Commissioner. See, e.g., Exhibit A.³ Constituents and members of the public used the interactive features of Defendant’s Facebook Page to express their opinions and viewpoints to Defendant in his capacity as Douglas County Commissioner. See, e.g., *id.* Defendant’s Facebook Page therefore constituted a designated or limited public forum. Indeed, in the now-breached Settlement Agreement and Release of All Claims (“the Settlement Agreement”) with Plaintiff, Defendant acknowledged that the comments section of his Facebook Page was a designated or limited public forum. See Exhibit B at ¶ 1(a)(ii)(1); Compl. at ¶¶ 14-17.

Plaintiff Blocked from Defendant’s Facebook Page

On or about June 21, 2015, Defendant Robinson and Plaintiff Bohanan both engaged in an online discussion (“the Discussion”) on the “Douglasville & Douglas

³ Exhibit A contains examples, but by no means a complete collection, of Defendant’s posts on “commissionerkelly.robinson” that related to his activities as Douglas County Commissioner. For a larger sampling of official-activity-related posts that appeared on “commissionerkelly.robinson” but were then migrated to Defendant’s New Facebook Page located at “kellyrobinsonsr,” see Exhibit F which contains screenshots from the New Facebook page “kellyrobinsonsr” as it appeared on May 28, 2020, approximately one day after it had been created and the Facebook page located at “commissionerkelly.robinson” had been shut down.

County for Civic Action” Facebook Group (“the Facebook Group”). Facebook Group members participating in the Discussion expressed concern about the county property tax rate, and voiced disapproval of what had transpired at Defendant Robinson’s “Mid Year State of the District” town hall meeting, including criticizing Defendant Robinson’s spending priorities in his role as a Douglas County Commissioner. See Compl. at ¶¶ 18-27; Exhibit C.

Plaintiff Bohanan posted a message in the Discussion asking if the town hall meeting had been videotaped and stating, “Thanks for the recap btw. UGH!” Defendant Robinson responded more than once during the Discussion, explaining and defending his opinions and actions. Defendant Robinson’s responses during the Discussion included several golfing analogies. Plaintiff Bohanan then commented, “I can’t figure out if Mr. Robinson is dismissive or just clueless. I am certain that the people asking questions are very serious. Taxpayers are being hit from every single direction on all levels and we’ve just about had it with flippant condescending elected officials. I can’t speak for everyone but serious answers to serious questions would be MUCH appreciated.” Another Facebook Group member named Bill Smith replied to Plaintiff Bohanan, “Yes Brenda, he should take a mulligan⁴ oh

⁴ The Merriam-Webster Dictionary defines “mulligan” as “a free shot sometimes given a golfer in informal play when the previous shot was poorly played.” See <https://www.merriam-webster.com/dictionary/mulligan>.

please” (ellipses in the original), to which Plaintiff Bohanan answered, “He’d do well to take it, Bill!” Exhibit C; see Compl. at ¶¶ 23-27.

Defendant Robinson replied stating, among other things, “As opposed to the mulligan, simply delete my comments and block my user name.” This comment by Defendant Robinson illustrates that he believes censoring speech is the appropriate mechanism by which to address opinions or viewpoints expressed in a public online forum that one does not like or disagrees with. In response to Defendant Robinson’s reply, Plaintiff Bohanan commented, “Figures,” accompanied by a frustrated face emoji. Exhibit C; see Compl. at ¶¶ 28-30.

After the foregoing Discussion, when Plaintiff Bohanan attempted to access Defendant Robinson’s Facebook page, located at <https://www.facebook.com/commissionerkelly.robinson>, she found that she was blocked. See Compl. at ¶ 31; Exhibit D.

Defendant’s Material Breach of the Settlement Agreement and the Continuing Violation of Plaintiff’s Constitutional Rights

By early 2020, Plaintiff Bohanan was still blocked from Defendant’s Facebook Page. Around this time, Plaintiff first became aware of the growing body of law establishing that it is unconstitutional for a government official to block or censor a member of the public from accessing or interacting with a social media account that the government official uses to communicate with the public about their

official role and activities based on the government official's disagreement with or dislike of the member of the public's expressed viewpoint. See id. at ¶¶ 32-33.

Defendant did not respond when Plaintiff wrote to him in February 2020, asking to be unblocked from Defendant's Facebook Page. After each retaining counsel and by no later than May 25, 2020, Plaintiff Bohanan, Defendant Robinson and Douglas County entered into a Settlement Agreement to resolve the matter of Defendant having unconstitutionally blocked Plaintiff from his Facebook Page. See id. at ¶¶ 34-40; Exhibit B.

The Settlement Agreement was drafted by Defendant's counsel and none of the relevant terms were altered by Plaintiff in finalizing the agreement. The Settlement Agreement specifies in the first "Whereas" clause that the Facebook Page from which Plaintiff is blocked is located at "commissionerkelly.robinson." See Exhibit B. The Settlement Agreement states in paragraph 1(a)(ii)(1) that the parties agree that the comments sections of this Facebook Page constitute either a limited public forum or designated public forum. See id. The Settlement Agreement provides that in consideration for Plaintiff's waiver and release of all claims against Defendant and Douglas County, Defendant agrees to unblock and restore access to blocked users as to Defendant's Facebook Page located at "commissionerkelly.robinson," which would include Plaintiff. See id. at ¶¶ 1(a), 1(a)(ii) & 2(a). The Settlement Agreement further provides that in consideration for

Plaintiff's waiver and release of all claims against Defendant and Douglas County, Defendant agrees that any user interacting with Defendant's Facebook Page in the comments section would not have comments deleted or be banned from commenting or viewing publicly posted content based on his or her use of protected speech. See id. at ¶ 1(a)(ii)(1); Compl. at ¶¶ 41-45.

The Settlement Agreement containing the foregoing terms of offer, acceptance, and consideration was mutually and voluntarily entered into by Plaintiff, Defendant and Douglas County and was fully executed by all parties and their respective counsel by no later than May 25, 2020. See Compl. at ¶¶ 46-47; Exhibit B.

By May 27, 2020, which was beyond the 24-hour window specified in the Settlement Agreement for unblocking and restoring Plaintiff's access to Defendant's Facebook Page, Plaintiff still remained blocked. When Plaintiff's counsel communicated this to Defendant's counsel, Defendant's counsel replied on May 27, 2020 that Defendant's Facebook Page was personal. See Compl. at ¶¶ 48-51.

Defendant Robinson never unblocked Plaintiff from the Facebook Page located at "commissionerkelly.com" as required by the terms of the Settlement Agreement. Instead, by no later than May 28, 2020, Defendant's Facebook Page located at "commissionerkelly.robinson" had been shut down and its content migrated or the URL changed to <https://www.facebook.com/kellyrobinsonsr>

(“Defendant’s New Facebook Page” or “the New Facebook Page”). See Compl. at ¶¶ 52-53; Exhibits E & F.

Plaintiff was and continues to be blocked from Defendant’s New Facebook Page. See Exhibit G. The New Facebook Page has the same picture of Defendant at the top of the page as did the now-defunct Facebook Page that was the subject of the Settlement Agreement, although the title of “Commissioner” has been removed from Defendant’s name. The New Facebook Page initially had much of the same, if not exactly the same, content as the now-defunct Facebook Page that was the subject of the Settlement Agreement, including posts and content directed to Defendant’s constituents relating, without limitation, to Defendant’s activities and opinions as a Douglas County Commissioner. The New Facebook Page also allows viewers to comment on Defendant’s posts and other viewers’ comments, and to “like” Defendant’s posts, creating the same limited or designated public forum as existed on the now-defunct Facebook Page that was the subject of the Settlement Agreement. See id. at ¶¶ 54-57; Exhibit F.

On June 1, 2020, in a further attempt to resolve the matter pre-litigation, Plaintiff’s counsel wrote to Defendant’s counsel pointing out that Defendant’s shutting down the Facebook Page that was the subject of the Settlement Agreement, migrating its content to the New Facebook Page, and still continuing to block Plaintiff constituted both a deliberate attempt to avoid compliance with the terms of

the Settlement Agreement and a continuing violation of Plaintiff's First Amendment rights. Defendant's counsel responded on June 3, 2020 that Defendant was in the process of deleting from the New Facebook Page all of Defendant's posts that were not personal. See Compl. at ¶¶ 58-59.

As of June 15, 2020 and continuing as of the date the Verified Complaint in this action was filed, the New Facebook Page, though culled of some of its prior content relating to Defendant Robinson's official position, still contains numerous posts relating to Douglas County politics, projects, and functions that Defendant Robinson attends in his capacity as a Douglas County Commissioner, including posts associated with the hashtags #DouglasCounty and #CommissionerKellyRobinson. See Exhibit H. Additionally, the New Facebook Page's comments section still operates as a designated or limited public forum where members of the public can express their views and opinions to and about Defendant Robinson in his capacity as a Douglas County Commissioner. See Compl. at ¶¶ 60-61; Exhibit H (see, e.g., comments from constituents in response to Defendant's December 9, 2017 post).

As a result of being blocked from the New Facebook Page, Plaintiff Bohanan continues to be deprived of the ability to view posts and communications that relate to Defendant in his role as an elected government official. Plaintiff Bohanan also continues to be deprived of the ability to participate in the New Facebook Page's

interactive features that are available to other members of the public who have not been blocked, such as posting comments about or “liking” Defendant’s posts. As a result of being blocked from the New Facebook Page, Plaintiff Bohanan continues to suffer loss of her First Amendment rights of speech and distress associated with that loss. See Compl. at ¶¶ 62-64.

Without the redress of this Court, Plaintiff is likely to suffer further and additional violation of her First Amendment rights because: (1) there is nothing preventing Defendant from continuing to post content to the New Facebook Page that relates to his role and activities as Douglas County Commissioner and as to which Plaintiff will not have access, and (2) Defendant Robinson and other members of the public with access to the New Facebook Page’s comments section are free to engage in future expression and debate relating to Defendant’s role and activities as an elected official as to which Plaintiff will not have access and will not be able to participate. See id. at ¶¶ 65-66.

ARGUMENT AND CITATIONS OF AUTHORITY

A preliminary injunction is appropriate where the movant establishes a substantial likelihood of success on the merits, a threat of irreparable injury, that Plaintiff’s injury outweighs any harm an injunction may cause to Defendant, and where granting the injunction is consistent with the public interest. See Four Seasons Hotels & Resorts v. Barr, 320 F.3d 1205, 1209 (11th Cir. 2003); K.H. Outdoors LLC

v. City of Trussville, 458 F.3d 1261, 1268 (11th Cir. 2006); Winter v. NRDC, 555 U.S. 7, 20 (2008); Fed. R. Civ. P. 65(b). Plaintiff need only show a substantial likelihood of success on at least one count of the complaint, not all counts. See Atlanta School of Kayaking, Inc. v. Douglasville-Douglas Co. Water and Sewer Auth., 981 F. Supp 1469, 1472 (N.D. Ga. 1997).

Furthermore, “at the preliminary injunction stage, a district court may rely on affidavits and hearsay materials which would not be admissible evidence for a permanent injunction, if the evidence is ‘appropriate given the character and objectives of the injunctive proceeding.’” Levi Strauss & Co. v. Sunrise Int’l Trading Inc., 51 F.3d 982, 985 (11th Cir. 1995) (quoting Asseo v. Pan Am. Grain Co., 806 F.2d 23, 26 (1st Cir. 1986)).

I. Plaintiff Bohanan is substantially likely to prevail: Defendant’s blocking Plaintiff from his Facebook Page constitutes impermissible viewpoint-based discrimination, unbridled discretion and prior restraint by a government official in regulating speech by members of the public, in violation of the First and Fourteenth Amendments.

A. Viewpoint Discrimination

Viewpoint-based restrictions on speech are presumptively unconstitutional in public and non-public forums. See Turner Broad. Sys. v. FCC, 512 U.S. 622, 641 (1994) (“[D]iscrimination against speech because of its message is presumed to be unconstitutional”); Widmar v. Vincent, 454 U.S. 263, 267-268 (1981) (“The

Constitution forbids a State to enforce certain exclusions from a forum generally open to the public, even if it was not required to create the forum in the first place.”). Regardless of the type of forum, government must treat speech from the public within a forum that it controls or owns in a viewpoint neutral manner. See, e.g., Rosenberger v. Rector & Visitors of the Univ. of Va., 515 U.S. 819, 829 (1995). Cf. Perry Education Assn. v. Perry Local Educators’ Ass’n., 460 U.S. 37, 48-49 (1983) (upholding a restriction on access to a non-public forum because it was judged not to be viewpoint-based).

Recent decisions establish that social media pages such as Defendant’s now-defunct Facebook Page (located at “commissionerkelly.robinson”) and Defendant’s New Facebook Page (located at “kellyrobinsonsr”) are public spaces subject to the public forum doctrine where strict scrutiny applies to viewpoint-based speech restrictions. See Packingham v. North Carolina, 137 S. Ct. 1730, 1735, 1737 (2017) (comparing social media to traditional public fora such as parks and streets and calling it “the most important place for the exchange of views” in the modern era and “perhaps the most powerful mechanisms available to a private citizen to make his or her voice heard”); Knight First Amendment Inst. v. Trump, 928 F.3d 226 (2d Cir. 2019) (affirming that President Trump’s decision to block users from his personal Twitter account for posting critical tweets were subject to the public forum doctrine and constituted prohibited viewpoint discrimination); Davison v. Randall,

912 F.3d 666, 687 (4th Cir. 2019) (concluding that the interactive component of county official’s Facebook Page amounted to a public forum and that official’s blocking of a county resident amounted to “viewpoint discrimination,” which is “prohibited in all forums”); Faison v. Jones, 2020 WL 869122 (E.D. Cal. Feb. 21, 2020) (granting preliminary injunction requiring county sheriff to unban leaders of local advocacy group from his social media page); Campbell v. Reisch, 2019 WL 573433, at *4 (W.D. Mo. Feb. 8, 2019) (holding public forum doctrine applied to state representative’s social media account); Price v. City of New York, 2018 WL 3117507, at *15 (S.D.N.Y. June 25, 2018) (“the City’s official Twitter pages share many characteristics of public forums” where Twitter is “generally open to the public,” “designed for and dedicated to expressive activities” and has “as a principal purpose...the free exchange of ideas”).

Defendant’s decisions to block Plaintiff Bohanan from his now-defunct Facebook Page located at “commissionerkelly.robinson” and to continue blocking her from his New Facebook Page located at “kellyrobinsonsr” are based on Plaintiff’s critical comments about Defendant as Douglas County Commissioner. Such decision-making constitutes unlawful viewpoint discrimination and lack of viewpoint neutrality by a state actor in the context of a designated or limited public forum.

B. Unbridled Discretion

Government regulation of public citizen speech may not be arbitrary and without standards, as such “unbridled discretion” violates the First and Fourteenth Amendments. For example, in United States v. Frandsen, 212 F.3d 1231 (11th Cir. 2000), the court struck down a federal park regulation where plaintiffs alleged that lack of strict time limits allowed “unbridled discretion” by the park superintendent to deny permits for assembly. As the court explained:

A park superintendent could receive a permit request well in advance of a planned political demonstration and then fail to act on the permit request until the date of the demonstration. . . . A park superintendent who does not agree with the political message to be espoused could allow the permit request to sit on his desk for an indefinite period of time – resulting in speech being silenced by inaction.

212 F.3d at 1240. See also Barrett v. Walker Cty. Sch. Dist., 872 F.3d 1209 (11th Cir. 2017) (striking down policy requiring preliminary meetings with school board superintendent prior to being granted permission to speak at school board meetings in part because policy vested superintendent with unbridled discretion to censor dissenting viewpoints at general meetings); Atlanta J. & Const. v. City of Atlanta Dept. of Aviation, 322 F.3d 1298 (11th Cir. 2003) (striking down airport news rack rental policy scheme where it allowed administrator discretion to set rental fees and approve or deny rental applications).

Here, Defendant Robinson has no standard or process for his selective blocking of citizens and constituents such as Plaintiff. He instead exercises

“unbridled discretion” to restrict the expression of citizens with whose views he does not agree when he blocks critical commentators like Plaintiff. The lack of constitutional standards for the Commissioner’s decision-making in regulating public citizen speech is an independent basis for Plaintiff’s substantial likelihood of success on the merits.

C. Prior Restraint

Any prior restraint on speech -- namely, a restriction preventing speech from entering the marketplace of ideas rather than a penalty imposed after a member of the public engages in speech -- carries “a heavy presumption against its constitutional validity.” Bantam Book, Inc. v. Sullivan, 372 U.S. 58, 70 (1963). This is because “a free society prefers to punish the few who abuse rights of speech after they break the law than to throttle them and all others beforehand.” Southeastern Promotions v. Conrad, 420 U.S. 557, 559 (1975); see also Near v. Minnesota ex. rel. Olson, 283 U.S. 697, 713 (1931) (holding that press freedom “consists in laying no previous restraints upon publications”); Nebraska Press Ass’n v. Stuart, 427 U.S. 539, 559 (1976) (“[P]rior restraints on speech and publication are the most serious and the least tolerable infringement on First Amendment rights”). New York Times Co. v. United States, 403 U.S. 713, 732 (1971) (applying Near and Bantam Books to hold that the government could not preemptively restrain the publication of the

leaked “Pentagon Papers” exposing sensitive and embarrassing aspects of U.S. policy decisions regarding the Vietnam War).

Prior restraint on speech is strongly disfavored by the courts because it serves to chill future speech. Nebraska Press Ass’n, 539 U.S. at 559 (“A prior restraint . . . has an immediate and irreversible sanction. If it can be said that a threat of criminal or civil sanctions after publication “chills” speech, prior restraint “freezes” it at least for the time”). Indeed, the Eleventh Circuit has noted that even viewpoint-neutral and content-neutral prior restraints on speech can have a chilling effect when there is “a long history of conflict” between the government and the speaker in question. Barrett, 872 F.3d at 1227 (citing Café Erotica of Florida, Inc. v. St. Johns County, 360 F.3d 1274 (11th Cir. 2004)).

Government officials blocking citizens from online communication fits squarely within the prohibition on prior restraint. Defendant Robinson’s decision to prevent Plaintiff Bohanan from accessing and posting comments on his now-defunct Facebook Page because of her critical comments, and his continuing to block Plaintiff from accessing and posting comments on his New Facebook Page constitute viewpoint-based prior restraints that cannot survive strict scrutiny. This too is an independent basis for find that Plaintiff has demonstrated a substantial likelihood of success on the merits.

II. Defendant’s blocking Plaintiff from his Facebook Pages constitutes irreparable injury.

It is well settled that “[t]he loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” Elrod v. Burns, 427 U.S. 347, 373 (1976). Here, Plaintiff Bohanan’s injury is ongoing as Defendant’s acts of censorship continue to silence her speech in a forum where other members of the public who have not been blocked are free to express themselves. Hence, the deprivation of Plaintiff’s ability to access or comment on Defendant’s now-defunct Facebook Page, and her continuing deprivation of these same First Amendment rights with respect to Defendant’s New Facebook Page constitute irreparable harm.

III. Plaintiff’s constitutional injuries outweigh any harm to Defendant who faces no cognizable injury from being expected to uphold his obligations under the First Amendment.

Defendant Robinson faces no cognizable harm from the relief sought by Plaintiff where she is only seeking for Defendant to comply with his obligations under the United States Constitution. See, e.g., Klein v. City of San Clemente, 584 F.3d 1196 (9th Cir. 2009) (where the conduct and policies of government officials affects “anyone seeking to express their views. . .the balance of equities and the public interest thus tip sharply in favor of enjoining the ordinance”); Chamber of Commerce of the United States v. Edmondson, 594 F.3d 742 (10th Cir. 2010) (state government “does not have an interest in enforcing a law that is likely

constitutionally infirm”). Hence, the balance of equities tips wholly in favor of Plaintiff Bohanan.

IV. Granting a preliminary injunction is consistent with the public interest where it protects freedom of speech.

The protection of free speech rights is always in the public interest. See K.H. Outdoors LLC, 458 F.3d at 1272 (recognizing that it is “always in the public interest to protect First Amendment liberties”) (internal citations omitted). Thus, where the injunction sought protects Plaintiff’s First Amendment rights, it serves the public interest.

CONCLUSION

For the forgoing reasons, Plaintiff respectfully requests that this court enter a preliminary injunction requiring Defendant Robinson to: (1) cease his unlawful practice of blocking Plaintiff from Defendant’s interactive social media Facebook pages based on viewpoint discrimination in violation of the First and Fourteenth Amendments of the United States Constitution; (2) unblock and provide access to Plaintiff to his Facebook page located at <https://www.facebook.com/kellyrobinsonsr>, which Defendant uses to interact with, among others, members of the public regarding his activities or opinions as a government official; and (3) refrain from blocking Plaintiff or other commentators - - or deleting their comments -- based on viewpoint-based or standard-less criteria from his Facebook page located at <https://www.facebook.com/kellyrobinsonsr> and

from any further or future Facebook pages that Defendant uses to interact with the public regarding his activities or opinions as a government official.

Respectfully submitted this 22nd day of June, 2020.

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