

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

_____)	
Georgia Latino Alliance for Human)	
Rights, et al.,)	
)	
Plaintiffs,)	
)	Case No. 1:11-cv-1804-TWT
v.)	
)	
Governor Nathan Deal, et al.,)	
)	
Defendants.)	
_____)	

PLAINTIFFS’ MOTION TO AMEND CAPTION

Plaintiffs respectfully move the Court to order an amendment to the caption to include the name of Plaintiff David Kennedy and to correct the middle initial for Paul Edwards. On June 2, 2011, Plaintiffs filed a Complaint, a Motion to Exceed Page Limits, and a Motion for Leave to Proceed under Pseudonyms in this case. Mr. Kennedy’s name was accidentally left off of the caption used in the complaint and associated filings. However, Mr. Kennedy is one of the plaintiffs bringing this action. *See* Complaint (ECF No. 1) at ¶¶ 60 (including Kennedy in list of parties), ¶¶ 100 (describing harm Kennedy faces from enactment of HB 87). In addition, Plaintiff Paul Edwards’s middle initial was erroneously listed as “J.” rather than

“C.” Plaintiffs request the Court to order that the caption be amended to reflect Plaintiff Kennedy’s name and to reflect Paul Edwards’s name as Paul C. Edwards. Plaintiffs submit that a granting of this request will not prejudice Defendants since these are non-substantive, technical corrections to ensure proper identification of the parties.

For the convenience of the Court, a proposed order is attached.

Dated: June 8, 2011

Respectfully submitted,¹

/s/ Michelle R. Lapointe

On behalf of Attorneys for Plaintiffs

Linton Joaquin (*pro hac vice*)
Karen C. Tumlin (*pro hac vice*)
Nora A. Preciado*
Melissa S. Keaney (*pro hac vice*)
NATIONAL IMMIGRATION LAW
CENTER
3435 Wilshire Boulevard, Suite 2850
Los Angeles, California 90010
T: (213) 639-3900
F: (213) 639-3911
Joaquin@nilc.org
Tumlin@nilc.org
Preciado@nilc.org
Keaney@nilc.org

Omar C. Jadwat*
Andre Segura*
Elora Mukherjee*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, New York 10004
T: (212) 549-2660
F: (212) 549-2654
ojadwat@aclu.org
asegura@aclu.org
emukherjee@aclu.org

Naomi Tsu (GSB No. 507612)
Michelle R. Lapointe (GSB No. 007080)

Cecillia D. Wang (*pro hac vice*)
Katherine Desormeau (*pro hac vice*)
AMERICAN CIVIL LIBERTIES

¹ Counsel certifies this document has been prepared in accordance with L.R. 5.1.

Daniel Werner (GSB No. 422070)
SOUTHERN POVERTY LAW CENTER
233 Peachtree St., NE, Suite 2150
Atlanta, Georgia 30303
T: (404) 521-6700
F: (404) 221-5857
naomi.tsu@splcenter.org
michelle.lapointe@splcenter.org
daniel.werner@splcenter.org

Mary Bauer (GSB No. 142213)
Andrew H. Turner*
Samuel Brooke*
SOUTHERN POVERTY LAW CENTER
400 Washington Ave.
Montgomery, Alabama 36104
T: (404) 956-8200
F: (404) 956-8481
mary.bauer@splcenter.org
andrew.turner@splcenter.org
samuel.brooke@splcenter.org

Tanya Broder (*pro hac vice*)
Jonathan Blazer*
NATIONAL IMMIGRATION LAW
CENTER
405 14th Street, Suite 1400
Oakland, California 94612
T: (510) 663-8282
F: (510) 663-2028
Broder@nilc.org
Blazer@nilc.org

Sin Yen Ling*
ASIAN LAW CAUCUS
55 Columbus Avenue
San Francisco, California 94111
T: (415) 896-1701 x 110

UNION FOUNDATION IMMIGRANTS'
RIGHTS PROJECT
39 Drumm Street
San Francisco, California 94111
T: (415) 343-0775
F: (415) 395-0950
cwang@aclu.org
kdesormeau@aclu.org

Chara Fisher Jackson (GSB No. 386101)
Azadeh N. Shahshahani (GSB No.
509008)
ACLU OF GEORGIA
1900 The Exchange, Suite 425
Atlanta, Georgia 30339
T: (770) 303-8111
cfjackson@acluga.org
ashahshahani@acluga.org

G. Brian Spears (GSB No. 670112)
1126 Ponce de Leon Ave., N.E.
Atlanta, Georgia 30306
T: (404) 872-7086
F: (404) 892-1128
Bspears@mindspring.com

R. Keegan Federal, Jr. (GSB No. 257200)
FEDERAL & HASSON, LLP
Two Ravinia Drive, Ste 1776
Atlanta, Georgia 30346
T: (678) 443-4044
F: (678) 443-4081

Charles H. Kuck (GSB No. 429940)
Danielle M. Conley (GSB No. 222292)
KUCK IMMIGRATION PARTNERS

F: (415) 896-1702
sinyenL@asianlawcaucus.org

LLC
8010 Roswell Road, Suite 300
Atlanta, Georgia 30350
T: (404) 816-8611
F: (404) 816-8615
CKuck@immigration.net
DConley@immigration.net

Attorneys for Plaintiffs

*Application for admission *pro hac vice* pending

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification to the following attorney for Defendants Deal, Olens, Reese, and Beatty, to whom a copy is also being hand-delivered today:

Devon Orland
Office of State Attorney General
40 Capitol Square, S.W.
Atlanta, GA 30334-1300
dorland@law.ga.gov
Attorney for Defendants Deal, Olens, Reese and Beatty

I hereby certify that a copy of the foregoing is being hand-delivered on this date to the following non-CM/ECF participant:

Falecia Stewart
Executive Director, Housing Authority of Fulton County
HAFC Headquarters
4273 Wendell Drive
Atlanta, GA 30336

This 8th day of June, 2011.

/s/ Michelle R. Lapointe