

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

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

JUN 22 2011

JAMES N. HATTEN, Clerk
[Signature]

GEORGIA LATINO ALLIANCE)
FOR HUMAN RIGHTS, ET AL)
)
Plaintiffs,)
)
vs.)
)
NATHAN DEAL, GOVERNOR OF)
THE STATE OF GEORGIA, IN HIS)
OFFICIAL CAPACITY, ET AL)
)
Defendant.)

Case No. 1:11-CV-1804-TWT

ANSWER

NOW COMES the defendant, Falecia Stewart, Executive Director of the Housing Authority of Fulton County, Georgia, and makes the following Answer to Plaintiff's Complaint for Declaratory and Injunctive Relief:

1.

Defendant admits the allegations of paragraphs 1, 2, 12, 13, 14, 15, 16, 61, 62, 63, 64, 65, 66, 103, 104, 131, 133, 134, 166, 168, 169, 172, 173, 175, 176, 177, 178, 179, 181, 182, 184, 185, 189, 190, 193, and 194 of Plaintiffs' Complaint.

2.

For want of sufficient knowledge, defendant can neither admit nor deny the allegations of paragraphs 17, 19, 20, 22, 24, 26, 29, 30, 32, 33, 34, 36, 37, 38, 40, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 132, 135, 136, 137, 138,

139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, and 171 of Plaintiffs' Complaint and, therefore, specifically denies same.

3.

Defendant denies the allegations of paragraphs 3, 4, 5, 6, 7, 8, 9, 10, 11, 23, 25, 27, 28, 31, 35, 39, 41, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 170, 174, 180, 183, 184, 185, 186, 187, 188, 192, and 195.

4.

Defendant admits the allegations of line 1 of paragraph 191 of Plaintiffs' Complaint. Defendant denies the balance of the paragraph.

FIRST DEFENSE

Plaintiffs' Complaint fails to state a claim upon which relief can be granted.

WHEREFORE, having fully answered, defendant prays that she be discharged, with all costs cast against the Plaintiffs.

This 29th day of June, 2011.

Respectfully submitted,

SMITH, GAMBRELL & RUSSELL, LLP



P. Andrew Patterson
Georgia Bar No. 566600

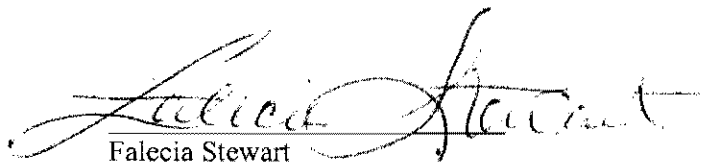
ATTORNEY FOR DEFENDANT

Suite 3100, Promenade II
1230 Peachtree Street, N.E.
Atlanta, Georgia 30309-3592
(404) 815-3708
8957532.1

STATE OF GEORGIA
COUNTY OF FULTON

Before me, the undersigned officer duly authorized to administer oaths, came Falecia Stewart, Executive Director of the Housing Authority of Fulton County, Georgia, who, after being duly sworn, on oath deposes and says that the facts contained in the foregoing Answer are true and correct to the best of her knowledge

This 21 day of June, 2011.



Falecia Stewart
Executive Director
Housing Authority of Fulton County, Georgia

Sworn to and subscribed
before me this 21 day of June, 2011



Notary Public

[NOTARY SEAL]

**TOMEKA LEE
NOTARY PUBLIC
CLAYTON COUNTY, GEORGIA
MY COMMISSION EXPIRES MAY 15, 2015**

JUN 22 2011

JAMES N. HATTEN, Clerk
By *[Signature]*
Deputy Clerk

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

GEORGIA LATINO ALLIANCE)
FOR HUMAN RIGHTS, et al)
)
Plaintiff,)
)
vs.)
)
NATHAN DEAL, GOVERNOR OF)
THE STATE OF GEORGIA, in his)
official capacity, ET AL)
)
Defendant.)

Case No. 1:11-CV-1804-TWT

CERTIFICATE OF SERVICE

I hereby certify that I have forwarded a copy of the attached Answer to the Plaintiffs by depositing same in the U. S. Mail with sufficient postage affixed thereto to the following addressees:

See Attached List

[Signature of P. Andrew Patterson]

P. Andrew Patterson
Georgia Bar No. 566600

ATTORNEY FOR DEFENDANT

Suite 3100, Promenade II
1230 Peachtree Street, N.E.
Atlanta, Georgia 30309-3592
(404) 815-3708

Linton Joaquin
Karla Preciado
Mellisa S. Keaney
NATIONAL IMMIGRATION LAW
CENTER
3435 Wilshire Boulevard,
Suite 2850
Los Angeles, California 90010

Mary Bauer (GSB No. 142213)
Andrew H. Turner
Samuel Brooke
SOUTHERN POVERTY LAW CENTER
400 Washington Ave.
Montgomery, Alabama 36104

Cecillia D. Wang
Katherine Desormeau
AMERICAN CIVIL LIBERTIES
UNION FOUNDATION IMMIGRANTS'
RIGHTS PROJECT
39 Drumm Street
San Francisco, California 94111

G. Brian Spears (GSB No. 670112)
1126 Ponce de Leon Ave., N.E.
Atlanta, Georgia 30306

R. Keegan Federal, Jr. (GSB No. 257200)
FEDERAL & HASSON, LLP
Two Ravinia Drive, Ste 1776
Atlanta, Georgia 30346

Devon Orland
OFFICE OF THE STATE ATTORNEY GENERAL
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300
Attorney for Defendants, Deal, Olens, Reese and
Beatty

Naomi Tsu (GSB No. 507612)
Michelle R. Lapointe (GSB No. 007080)
Daniel Werner (GSB No. 422070) SOUTHERN
POVERTY LAW CENTER
233 Peachtree St., NE, Suite 2150 Atlanta,
Georgia 30303

Tanya Broder
Jonathan Blazer
NATIONAL IMMIGRATION LAW
CENTER
405 14th Street, Suite 1400
Oakland, California 94612

Chara Fisher Jackson (GSB No. 386101)
Azadeh N. Shahshahani (GSB No. 509008)
ACLU OF GEORGIA
1900 The Exchange, Suite 425
Atlanta, Georgia 30339

Sin Yen Ling
ASIAN LAW CAUCUS
55 Columbus Avenue
San Francisco, California 94111

Charles H. Kuck (GSB No. 429940)
Danielle M. Conley (GSB No. 222292)
KUCK IMMIGRATION PARTNERS LLC
8010 Roswell Road, Suite 300
Atlanta, Georgia 30350

Omar C. Jadwat
Andre Segura
Elora Mukhellee
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad Street, 18th Floor
New York, New York 10004