

**IN THE SUPERIOR COURT OF CHATHAM COUNTY
STATE OF GEORGIA**

GEORGIA CARRY.ORG, INC.,)
SHANE MONTGOMERY, and WILLIAM)
THEODORE MOORE, III,)
)
Plaintiffs,)
)
v.)
)
THOMAS C. BORDEAUX, JR.,)
Individually and as Judge of)
the Chatham County Probate Court)
)
Defendant.)
_____)

Civil Action No. SPCV 18-00523-BA

BRIEF IN SUPPORT OF MOTION TO ADD A PARTY PLAINTIFF

Introduction

Plaintiffs Shane Montgomery, William Theodore Moore, III, and GeorgiaCarry.Org, Inc. (collectively, “GCO”) commenced this action for mandamus and other relief against Defendant Thomas C. Bordeaux, Jr., the judge of the Probate Court of Chatham County, (“Bordeaux”) for violating O.C.G.A. § 16-11-129(d)(4) by failing to process applications and issue Georgia weapons carry licenses (“GWLs”) within the time required by that statute. While this case was pending, other similarly situated applicants have come forward. GCO seeks to add one, Joseph Smith, as a party plaintiff. If allowed to join as a plaintiff, Smith would show the Court that he applied to Bordeaux for a GWL on March 30, 2018, that he is eligible for a GWL and properly applied for one, and that the statutory time elapsed without Bordeaux’s issuing him a GWL.

This 18th day of July, 2018

/s/ John R. Monroe

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CERTIFICATE OF SERVICE

I certify that on July 18, 2018, I served a copy of the foregoing via U.S. Mail upon:

Jennifer Davenport
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John R. Monroe