

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

UNITED STATES OF AMERICA
Plaintiff,

v.

BRAD RAFFENSPERGER, in his
Official Capacity as Secretary of State
for the State of Georgia,

Defendant.

CASE NO: 1:26-CV-485-ELR

NOTICE OF INTENT TO FILE PETITION FOR WRIT OF MANDAMUS

The United States respectfully informs the Court that in the event the Court does not rule on the United States' Motion to Disqualify, Dkt. 112, by 5:00 P.M. on Wednesday, June 17, 2026, the United States intends to file a petition for a writ of mandamus in the United States Court of Appeals for the Eleventh Circuit.

On May 29, 2026, the United States filed a Motion to Disqualify, arguing that Judge Ross's improper attendance at a partisan and political event gave rise to an appearance of bias necessitating her recusal. On June 3, the United States filed a Motion for Emergency Ruling, explaining that the rapidly approaching federal election necessitates prompt resolution of the underlying action that the United States has brought against Secretary Raffensperger, and thus a prompt resolution of the Motion to Disqualify. The United States requested that the Court rule on the pending Motion to Disqualify by June 12. Dkt. 117 at 5.

The Court has yet to rule on the Motion to Disqualify, which has been pending for over two weeks and is fully briefed. For the reasons explained in the Motion for Emergency Ruling, any further delays in this lawsuit prejudice the United States. Accordingly, the United States plans to file a petition for a writ of mandamus in the event the Court does not rule on the United States' Motion to Disqualify, Dkt. 112, by 5:00 P.M. on Wednesday, June 17, 2026.

DATED: June 15, 2026

Respectfully submitted,

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CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing motion was prepared in Times New Roman 14, a font and type selection approved by the Court in L.R. 5.1(C).

/s/ John Casali

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