

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

**VOTERGA,
PETITIONER,**

vs.

CIVIL ACTION NO.: SUV2022001314

**COUNTY OF COWETA, COUNTY OF COBB,
AND COUNTY OF FORSYTH,
RESPONDENTS.**

**PETITIONER’S RESPONSE TO SPECIAL APPEARANCE MOTION FOR SUMMARY
JUDGMENT OR IN THE ALTERNATIVE, MOTION TO DISMISS**

COMES NOW, THE PETITIONER, and by and through his attorney and files this his Response to Cobb County’s Special Appearance Motion for Summary Judgement or in the alternative Motion to Dismiss and shows this Honorable Court as follows:

A review of this Motion shows that this Defendant argues the same defenses as the previous Motion to Dismiss or in the alternative Motion for Summary Judgement filed by Defendant, Forsyth County. As such, the Petitioner re-avers and incorporates by reference his previous response to Defendant Forsyth County’s Motion to Dismiss or in the alternative Motion for Summary Judgement in its entirety, as if restated verbatim.

WHEREFORE, THE PETITIONER prays that Cobb County’s Special Appearance Motion for Summary Judgment or in the alternative Motion to Dismiss be **DENIED** in its entirety.

Respectfully submitted this the 13th day of March, 2025.

HARDING LAW FIRM, LLC

/S/ *Todd A. Harding*

Todd A. Harding, For the Firm

Ga. Bar No.: 101562

Attorney for Petitioner

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CERTIFICATE OF SERVICE

This is to certify that I have served this day a copy of the foregoing **PETITIONER'S RESPONSE TO SPECIAL APPEARANCE MOTION FOR SUMMARY JUDGMENT OR IN THE ALTERNATIVE, MOTION TO DISS** by court approved electronic service to ensure delivery as follows:

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Respectfully submitted this the 13th day of March, 2025.

HARDING LAW FIRM, LLC

/S/ Todd A. Harding

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