

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,

v.

ROBERT DAVID CHEELEY, ET AL.,

Defendants.

Case No. 23SC188947

**MOTION TO ADOPT CO-DEFENDANT RAY SMITH'S SPECIAL
DEMURRER AS TO COUNTS 13 AND 19**

Pursuant to U.S.C.R. 31.1 and O.C.G.A. § 17-7-110, Defendant Robert David Cheeley adopts the Special Demurrer to Counts 13 and 19 timely filed by Co-Defendant Ray Smith in addition to the prayers for relief set forth in the initial set of demurrers. Cheeley agrees that Counts 13 and 19 are subject to either a general or special demurrer because they do not allege that the false documents were given to anybody. Cheeley therefore adopts the entirety of Smith's Special Demurrer as to those counts.

Respectfully submitted, November 28, 2023.

/s/ Christopher S. Anulewicz_____

Christopher S. Anulewicz

Georgia Bar No. 020914

Wayne R. Beckermann

Georgia Bar No. 747995

BRADLEY ARANT BOULT CUMMINGS LLP

Promenade Tower

1230 Peachtree Street NE

Atlanta, GA 30309

E-mail: canulewicz@bradley.com

Telephone: (404) 868-2030

Facsimile: (404) 868-2010

/s/ Richard A. Rice,_____

Richard A. Rice, Jr.

Georgia Bar No. 603203

THE RICE LAW FIRM, LLC
3151 Maple Drive, NE
Atlanta, Georgia 30305
Email: richard.rice@trlfirm.com
Telephone: 404-835-0783
Facsimile: 404-481-3057

Attorneys for Defendant Robert David Cheeley

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CERTIFICATE OF SERVICE

I hereby certify that I have, this 28th day of November 2023, served a true and correct copy of the within and foregoing MOTION TO ADOPT CO-DEFENDANT RAY SMITH'S SPECIAL DEMURRER AS TO COUNTS 13 AND 19 via electronic filing.

/s/ Christopher S. Anulewicz
Christopher S. Anulewicz
Georgia Bar No. 020914
BRADLEY ARANT BOULT CUMMINGS LLP
Promenade Tower
1230 Peachtree Street NE
Atlanta, GA 30309
E-mail: canulewicz@bradley.com
Telephone: (404) 868-2030
Facsimile: (404) 868-2010

Attorney for Defendant Robert David Cheeley