

COPY

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

RAYMOND GADDY, BARRY HUBBARD,
LYNN WALKER HUNTLEY, and DANIEL
REINES,

Plaintiffs,

vs.

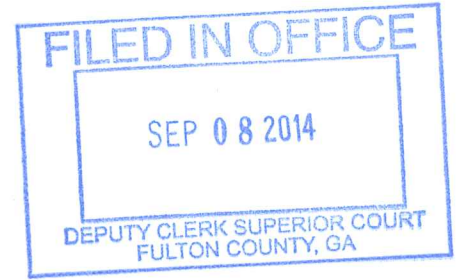
GEORGIA DEPARTMENT OF REVENUE,
and DOUGLAS J. MACGINNITIE, in his
official capacity as STATE REVENUE
COMMISSIONER OF THE GEORGIA
DEPARTMENT OF REVENUE,

Defendants,

and

RUTH GARCIA, ROBIN LAMP,
TERESA QUINONES, and ANTHONY
SENEKER,

Intervenor-Defendants.



CIVIL ACTION NO. 2014-CV-244538

**PARENT-INTERVENORS' REPLY IN SUPPORT OF THEIR
CROSS-MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS
AS TO COUNTS I – III AND VI**

Parent-Intervenors, Ruth Garcia, Robin Lamp, Teresa Quinones, and Anthony Seneker,
by and through undersigned counsel, hereby file their Reply in Support of their Cross-Motion for
Partial Judgment on the Pleadings as to Counts I – III and VI.

Introduction and Factual Background

Georgia's Scholarship Tax Credit Program, O.C.G.A. § 20-2A-1, *et seq.* and § 48-7-
29.16 ("Scholarship Program" or "Program"), is a program of true private charity that allows the