FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIACARRY.ORG, INC., and REGIS GOYKE,	)	
Plaintiffs,	)	
v.	)	**CIVIL ACTION FILE**
PINKIE TOOMER, in her official capacity as Judge of the Probate Court of Fulton county, Georgia, and all others similarly situated,	)	**NO. 1:08-CV-2141-CC**
Defendants.	)	

DEFENDANT PINKIE TOOMER'S BRIEF IN OPPOSITION TO PLAINTIFFS' MOTION TO CERTIFY CLASS

COMES NOW the Honorable Pinkie Toomer, Fulton County Probate Judge (hereinafter "Judge Toomer"), by and through her undersigned counsel and without submitting to the jurisdiction of the Court, and files this Brief in Opposition to Plaintiffs' Motion to Certify Class pursuant to Fed. R. Civ. P. 23.

I. FACTUAL BACKGROUND

Plaintiff GaCarry.Org, Inc. (hereinafter "GCO") is a non-profit corporation organized under the laws of the State of Georgia. (Compl. ¶ 4). Plaintiff Regis Goyke (hereinafter "Goyke") is a citizen and resident of the state of Wisconsin, a citizen of the United States and a member of GCO. (Compl. ¶¶ 5-6). Goyke is a frequent visitor to the State of Georgia and has

engaged in activities involving firearms, including the recreational shooting of handguns, while in the State of Georgia. (Compl. ¶¶ 23-25). Defendant Judge Toomer serves as the Fulton County, Georgia Probate Judge. (Compl. ¶ 7).

On June 19, 2008, John Monroe, counsel for GCO and Goyke, allegedly wrote to Judge Toomer's office asking if Goyke would be permitted to apply for a Georgia firearms license (hereinafter "GFL") pursuant to O.C.G.A. § 16-11-129. (Compl. ¶¶ 12, 14, 31). Plaintiffs allege that Judge Toomer's clerk responded in writing expressing his opinion that Goyke would not be allowed to apply for a GFL as the law governing the issuance of GFLs does not make any exceptions allowing persons who are not residents of the State of Georgia to be granted a GFL. (Compl. ¶¶ 1, 3, 32). There is no indication that Judge Toomer was in any way involved in the preparation of this response or that she was even aware that such an inquiry had been received by her clerk. (Compl., generally). Likewise, there is no indication that Goyke actually applied for a GFL at any point or took any other steps to challenge or verify the opinion of this member of Judge Toomer's staff. (*Id*.).

Plaintiffs assert that the current action is authorized as a class action pursuant to Rule 23 of the Federal Rules of Civil

Procedure and attempt to define a class of defendants to include every probate judge in the State of Georgia, (Compl. ¶¶ 8-9), and that Judge Toomer is an adequate representative of the proposed class of defendants. (Compl. ¶ 10). Plaintiffs filed a Motion to Certify Class in accord with Fed. R. Civ. P. 23 on July 10, 2008.

II. ARGUMENT AND CITATION TO AUTHORITY

Goyke and GCO have requested class certification pursuant to Fed. R. Civ. P. 23(b)(3) for the claims asserted against Judge Toomer and each of the other probate judges in the State of Georgia. Parties seeking class certification pursuant to Fed. R. Civ. P. 23(b)(3) must meet the four requirements of Fed. R. Civ. P. 23(a)[1] and, in addition, must demonstrate that:

> the questions of law or fact common to the members of the class predominate over any questions affecting only individual members, and that a class action is superior to other available methods for the fair and

[1] Fed R. Civ. P. 23(a) provides as follows:

(a) *Prerequisites to a Class Action.* One or more members of a class may sue or be sued as representative parties on behalf of all only if (1) the class is so numerous that joinder of all members is impracticable, (2) there are questions of law or fact common to the class, (3) the claims or defenses of the representative parties are typical of the claims or defenses of the class, and (4) the representative parties will fairly and adequately protect the interests of the class.

> efficient adjudication of the controversy. The matters pertinent to the findings include: (A) the interest of members of the class in individually controlling the prosecution or defense of separate actions; (B) the extent and nature of any litigation concerning the controversy already commenced by or against members of the class; (C) the desirability or undesirability of concentrating the litigation of the claims in the particular forum; (D) the difficulties likely to be encountered in the management of a class action.

Fed. R. Civ. P. 23(b)(3). "The initial burden of proof to establish the propriety of class certification rests with the advocate of the class." *Rutstein v. Avis Rent-A-Car Systems Inc.,* 211 F.3d 1228, 1233 (11th Cir. 2000); *see also Zeidman v. J. Ray McDermott & Co., Inc.,* 651 F.2d 1030, 1038 (5th Cir. 1981). Plaintiffs have failed to demonstrate that the proposed class meets the requirements of both Fed. R. Civ. P. 23(a) and 23(b)(3) and, as such, their Motion to Certify Class should be denied.

A. Plaintiffs Have Failed to Meet the Requirements of Fed. R. Civ. P. 23(a)

As a prerequisite to maintaining a class action in the federal courts, Fed R. Civ. P. 23(a) states that one or more members of a class may be sued as representative on behalf of an entire class **only** "if (1) the class is so numerous that joinder of all members is impracticable, (2) there are questions of law or fact common to the class, (3) the claims or defenses of the

representative parties are typical of the claims or defenses of the class, and (4) the representative parties will fairly and adequately protect the interests of the class." Fed. R. Civ. P. 23(a). Plaintiffs have failed to meet the requirements of Fed. R. Civ. P. 23(a).

1. Plaintiffs Have Failed to Meet the Requirements of Fed. R. Civ. P. 23(a)(1)

One or more members of a class may be sued as a representative on behalf of an entire class only if the class is so numerous that joinder of all members is impracticable. Fed. R. Civ. P. 23(a)(1). Determination of the Rule 23(a)(1) numerosity component requires examination of the specific facts of each case and imposes no absolute limitations. *General Tel. Co. of the Northwest, Inc. v. Equal Employment Opportunity Commission*, 446 U.S. 318, 330, 100 S.Ct. 1698, 1706 (1980).

While Plaintiffs assert in their Motion to Certify Class that a case with 159 individual defendants would be unworkably large, Plaintiffs cite no case law in support of this proposition. Indeed, the number of proposed class members alone is not the determinative factor under Fed. R. Civ. Pro. R. 23(a)(1). *See Zeidman,* 651 F.2d at 1038. Since the proper focus under Fed. R. Civ. P. 23(a)(1) is on whether joinder of all members is practicable in view of the numerosity of the class,

courts must take factors other than the simple number of members within a purported class into consideration, such as the geographic diversity of the class members, the nature of the action, the size of each plaintiff's claim, judicial economy and the inconvenience of trying individual lawsuits, and the ability of the individual class members to institute individual lawsuits. *Id.* Plaintiffs in this matter have failed to address a single one of these factors in their pending Motion to Certify Class. As "[t]he initial burden of proof to establish the propriety of class certification rests with the advocate of the class," *Rutstein,* 211 F.3d at 1233, Plaintiffs Motion to Certify Class should be denied based on this failure to address the applicable factors alone.

Even when a specific number of class members is asserted, the Court must consider several other factors when analyzing whether joinder would be impracticable, including the geographic dispersal of the members of the purported class. Instructive in this matter is *Kuehn v. Cadle Co., Inc.*, 245 F.R.D. 545 (M.D. Fla. 2007), in which the court held that the narrow description of the class itself contained within plaintiff's complaint, only persons in the state of Florida who received a certain letter between certain dates, demonstrated on its face that the class

is most likely not geographically dispersed, but rather is contained within an established jurisdictional boundary. *Kuehn*, 245 F.R.D. at 550 (M.D. Fla. 2007). The court also took note of the fact that it would be fairly easy to identify the class members and their addresses as they were all on file with the Defendant. *Id*. Relying on these factors, the court found that joinder would not be impracticable or unduly burdensome in that matter. *Id*.

Plaintiffs' Complaint in this matter, asserting claims against a purported class comprised of each of the 159 probate court judges in the State of Georgia, is by its own definition limited to persons located and locatable within the State of Georgia, a defined jurisdictional boundary. Additionally, Section 1A of Plaintiffs' own Motion to Certify Class states that each of the members of this purported class is easily reached via a centralized website, provided by Plaintiffs, which lists the contact information and a map to the location of each and every probate judge in the State of Georgia.

As each member of the proposed defendant class is located within the State of Georgia and is easily identifiable and locatable, Plaintiffs have not established that this purported class is so numerous that joinder of all members would prove

impractical. Indeed, any concerns as to the impracticality of joinder in this matter are further undermined by Plaintiffs' own assertion at section 1F of their Motion to Certify Class that "this case will be particularly easy to manage, even as a class action." Given Plaintiffs' complete failure to address or establish that the proposed defendant class meets the requirements imposed by Fed. R. Civ. P. 23(a)(1), Plaintiffs' Motion to Certify Class should be denied.

2. Plaintiffs Have Failed to Meet the Requirements of Fed. R. Civ. P. 23(a)(2)

One or more members of a class may be sued as representative on behalf of an entire class only if there are questions of law or fact common to the class. Fed. R. Civ. P. 23(a)(2). This provision does not require complete identity of legal claims among the class members. *Johnson v. American Credit Co.*, 581 F.2d 526, 532 (5th Cir. 1978). However, Rule 23(a)(2) does require that there be at least one issue whose resolution will affect all or a significant number of the putative class members. *Stewart v. Winter*, 669 F.2d 328, 335 (5th Cir. 1982).

Plaintiffs assert that the constitutional challenge to O.C.G.A. § 16-11-129(a) outlined in their Complaint creates a common question of law simply because the requirements of said

statute apply to each probate judge in the State of Georgia. Similar assertions were rejected in *Love v. Turlington*, 733 F.2d 1562 (11th Cir. 1984), in which plaintiffs asserted that the commonality requirement of Rule 23(a)(2) had been met in their challenge to a state-wide test that was a factor in determining whether high school students were eligible to graduate. Because decisions as to individual students who may have failed the state-wide exam were made by individual teachers in individual districts throughout the state based on a multitude of factors, the Court held that commonality was not present. *Love,* 733 F.2d at 1564 (11th Cir. 1984).

Similarly, each of the probate judges in the State of Georgia is tasked with evaluating GFL applications submitted within his or her jurisdiction. The decision to issue or deny a permit is based on a multitude of factors and each applicant will be judged based on his or her own unique circumstances. While Plaintiffs assert that a probate judge has no discretion to deny a GFL to an eligible applicant, it is the probate judge who receives such an application who must then determine if such applicant is indeed eligible under the law. As the personal judgment as to the eligibility of each applicant is required of the probate judge receiving such application, there is no

guarantee that an application filed with the probate judge of one county would be handled in the same manner as that filed with a probate judge of any other county and, therefore, no commonality can be seen to exist in this matter. As Plaintiffs have failed to show that the requirements of Rule 23(a)(2) are satisfied in this matter, Plaintiffs' Motion to Certify Class should be denied.

3. Plaintiffs Have Failed to Meet the Requirements of Fed. R. Civ. P. 23(a)(3)

One or more members of a class may be sued as representative on behalf of an entire class only if the claims or defenses of the representative parties are typical of the claims or defenses of the class. Fed. R. Civ. P. 23(a)(3). The typicality and commonality requirements of Fed. R. Civ. P. 23 "tend to merge." *General Telephone Co. of Southwest v. Falcon,* 457 U.S. 147, 157 n. 13, 102. S.Ct. 2364, 2371 n. 13 (1982). "Traditionally, commonality refers to the group characteristics of the class as a whole and typicality refers to the individual characteristics of the named [party] in relation to the class." *Prado-Steiman v. Bush,* 221 F.3d 1266, 1278-79 (11th Cir. 2000).

"'Typicality measures whether a sufficient nexus exists between the claims of the named representatives and those of the class at large.'" *Cooper v. Southern Company,* 390 F.3d 695, 713

(11th Cir. 2004) (citing *Prado-Steiman v. Bush,* 221 F.3d 1266, 1279 (11th Cir. 2000)). "The typicality requirement is satisfied if 'the claims or defenses of the class and class representative arise from the same event or pattern or practice and are based on the same theory.'" *Agan v. Katzman & Korr, P.A.,* 222 F.R.D. 692, 698 (S.D. Fla. 2004), (citing *Kornberg v. Carnival Cruise Lines, Inc.,* 741 F.2d 1332, 1337 (11th Cir. 1984)).

Again, Plaintiffs have failed to establish in any way that Judge Toomer's position in this matter are typical of each of the probate judges throughout the State of Georgia. Plaintiffs simply assert at Section 1C of their Motion to Certify Class that "it can be readily expected that each member of the class would have identical defenses" but offer absolutely nothing to substantiate this position. The event alleged in Plaintiffs' Complaint to have triggered this action amounts to a statement of opinion made by a member of Judge Toomer's staff. This conduct is completely unrelated to and cannot be imputed to Judge Toomer herself, much less the other 158 probate judges that make up the proposed defendant class. As such, Judge Toomer's involvement in this matter as a named defendant and that of the other members of the proposed class cannot be seen to have arisen from the same event, pattern or practice and

Plaintiffs' Motion to Certify Class should be denied based on their failure to establish the typicality required by Fed. R. Civ. P. 23(a)(3).

4. Plaintiffs Have Failed to Meet the Requirements of Fed. R. Civ. P. 23(a)(4)

One or more members of a class may be sued as representative on behalf of an entire class only if the representative parties will fairly and adequately protect the interests of the class. Fed. R. Civ. P. 23(a)(4). The adequacy requirement applies to both class representatives and class counsel. *Veal v. Crown Auto Dealerships, Inc.,* 236 F.R.D. 572, 578 (M.D. Fla. 2006) (citing *London v. Wal-Mart Stores, Inc.,* 340 F.3d 1246, 1253 (11th Cir. 2003)). In order to establish adequacy, the named representatives must be in a position to vigorously assert and defend the interests of the class. *Lyons v. Georgia-Pacific Corp. Salaried Employees Retirement Plan,* 221 F.3d 1235, 1253 (11th Cir. 2000). Class counsel likewise must be competent and qualified to prosecute the action. *Griffin v. Carlin,* 755 F.2d 1516, 1533 (11th Cir. 1985) ("[t]he adequate representation requirement involves questions of whether plaintiffs' counsel are qualified, experienced and generally able to conduct the proposed litigation.").

Merely finding, however, that plaintiffs' counsel are capable and that plaintiffs will adequately pursue prosecution of the lawsuit does not end the inquiry into the adequacy of the class representatives. *Griffin v. Carlin,* 755 F.2d 1516, 1533 (11th Cir. 1985). The court must also examine whether any antagonistic interests exist between the proposed representatives and the rest of the class. *Id.* For purposes of that analysis, "[a]ntagonistic interests are not only those which directly oppose one another, but also are those which may be hostile to one another or unharmonious such that one party's interest may be sacrificed for another's .... [The] plaintiffs bear the burden of proof on this issue just like all other issues raised in connection with the motion for class certification. In challenging the representatives' adequacy, the defendant 'does not have to show *actual* antagonistic interests; the potentiality is enough.'" *Telecomm Tech. Servs., Inc. v. Siemens Rolm Communications, Inc.,* 172 F.R.D. 532, 544-45 (N.D. Ga. 1997) (quoting *Plekowski v. Ralston Purina Co.,* 68 F.R.D. 443, 452 (M.D. Ga. 1975)). Due process requires that no potential conflicts exist between class representatives and class members that would interfere with the representation of the class. *Wyatt v. Poundstone,* 169 F.R.D. 155, 165 (M.D. Ala.

1995); *see also Warren v. City of Tampa,* 693 F.Supp. 1051, 1061 (M.D. Fla. 1988), *aff'd,* 893 F.2d 347 (11th Cir. 1989) ("Conflicts relating to the specific issues being litigated will bar class certification").

In the instant matter, Plaintiffs have offered nothing to substantiate their assertion at Section 1D of the Motion to Certify Class that Judge Toomer "can be expected to represent the interests of the class better than any other class member could" or to establish the uniformity of the interests of the proposed class. Indeed, Judge Toomer, as probate judge of Fulton County, has no stake in the question of the constitutionality of the challenged statute. Judge Toomer is charged with certain tasks under the challenged statute as well as the law of the State of Georgia generally. Judge Toomer will follow the law, whatever it is. Therefore, Judge Toomer should never be placed in the position of advocating the constitutionality of the challenged statute.

Despite Judge Toomer's lack of a personal interest in this matter, other members of the proposed class may be avid gun advocates or opponents and such feelings might color their response to the instant suit. Such potential conflicts in interests among the proposed defendant class establish that

neither Judge Toomer nor any other member of the proposed class can adequately represent the interests of each class member. As such, Plaintiffs have failed to establish compliance with Fed. R. Civ. P. 23(a)(4) and their Motion to Certify Class should be dismissed accordingly.

B. Plaintiffs Have Failed to Meet the Requirements of Fed. R. Civ. P. 23(b)(3)

Even if the Court were to find that the prerequisites of Fed. R. Civ. P. 23(a) outlined above are met, Plaintiffs, as the parties seeking certification of the proposed Defendant class, must then show that the action is maintainable under at least one of the three provisions of Fed. R. Civ. P. 23(b). *See Amchem Products, Inc. v. Windsor,* 521 U.S. 591, 613-16, 117 S.Ct. 2231, 2244-46 (1997). Plaintiffs in the instant matter assert that they have met the requirements of Fed. R. Civ. P. 23(b)(3) based on their plain statement at section 1E of their Motion to Certify Class that there are no individual questions raised by Plaintiffs' Complaint. Courts may grant class certification pursuant to Fed. R. Civ. P. 23(b)(3) where the court finds that the questions of law or fact common to class members predominate over any questions affecting only individual members, and that a class action is superior to other available methods for fairly and efficiently adjudicating the controversy.

Fed. R. Civ. P. 23(b)(3). Plaintiffs have failed to show that they meet the requirements of Fed. R. Civ. P. 23(b)(3).

1. Plaintiffs Have Failed to Establish That Common Questions Predominate Over Individual Questions in Accord with Fed. R. Civ. P. 23(b)(3)

In evaluating whether common questions predominate, all questions of law or fact need not be common; but some questions must be common to the class and those questions must predominate over individual questions. *See Cox v. American Cast Iron Pipe Co.,* 784 F.2d 1546, 1557 (11th Cir. 1986). The issues of the class subject to generalized proof must predominate over issues subject to individualized proof. *Rutstein,* 211 F.3d at 1233; *see also Jackson v. Motel 6 Multipurpose, Inc.,* 130 F.3d 999, 1005 (11th Cir. 1997) (citing *Kerr v. City of West Palm Beach,* 875 F.2d 1546, 1557-58 (11th Cir. 1989)). The inquiry of predominance "focuses on 'the legal or factual questions that qualify each class member's case as a genuine controversy,' and is '*far more demanding*' than Rule 23(a)'s commonality requirement." *Jackson,* 130 F.3d at 1005 (quoting *Amchem Prod., Inc., v. Windsor,* 521 U.S. 591, 594, 117 S.Ct. 2231, 2236 (1997) (emphasis added)).

Plaintiffs assert that common questions of law predominate based simply on an opinion of the Georgia Attorney General

stating that probate judges have no discretion to deny a GFL to an eligible applicant. Georgia Atty. Gen. Op. U89-21. Reliance on this opinion presumes that a Plaintiff in this matter actually applied for a GFL and was denied. Plaintiffs' own Complaint makes crystal clear that no GFL application was ever filed by any Plaintiff in this matter. (Compl., generally).

Further, Plaintiffs' argument ignores the inherent discretion that each probate judge must exercise to determine if a GFL applicant is indeed eligible. While the Georgia Attorney General has opined that probate judges cannot deny a GFL to an eligible applicant, it is the responsibility of each probate judge to determine if the eligibility criteria have been met. The multitude of questions that will arise surrounding the determination of eligibility of a GFL applicant, unique to each individual probate judge in the proposed class, are exactly the type of individualized questions that could overtake the larger constitutional question posed by Plaintiffs. As Plaintiffs have failed to establish that common questions predominate over individual questions in accord with Fed. R. Civ. P. 23(b)(3), Plaintiffs Motion to Certify Class should be denied.

2. Plaintiffs Have Failed to Establish That A Class Action Is Superior to Other Methods of Adjudicating the Instant Controversy in Accord with Fed. R. Civ. P. 23(b)(3)

Even if this Court were to find that some question of law or fact common to members of the proposed class members predominate over any questions affecting only individual members, the Court must then consider whether a class action is superior to other available methods for fairly and efficiently adjudicating the controversy. Fed. R. Civ. P. 23(b)(3). Rule 23(b)(3), includes four factors which are to be considered: (1) interest in controlling individual prosecutions or defenses; (2) existence of other related litigation; (3) desirability of forum; and, (4) manageability. Plaintiffs' Motion to Certify Class completely ignores the delineated factors, instead focusing on the expense to Plaintiffs and judicial resources that would be expended if this suit were brought against each proposed class member individually. Plaintiffs' assertions are simply not relevant to this inquiry. As "[t]he initial burden of proof to establish the propriety of class certification rests with the advocate of the class," *Rutstein,* 211 F.3d at 1233, Plaintiffs Motion to Certify Class should be denied based on this failure to address the applicable factors alone.

As to Rule 23(b)(3)(A), the interest of the members of the proposed class in individually controlling the prosecution or defense of separate actions, this factor is intimately tied to the discretion exercised by each probate judge in determining eligibility of GFL applicants as discussed in Section II.A.2 of this brief. As each proposed class member has his or her own staff and his or her own method for determining if a GFL applicant is eligible, each proposed class member could also be expected to have great interest in how claims such as those asserted by Plaintiffs in this matter would be defended.

Rule 23(b)(3)(B) requires that the court consider the "extent and nature of any litigation concerning the controversy already commenced by or against members of the class." Fed. R. Civ. P. 23(b)(3)(B). At this juncture Judge Toomer is unaware of any such pending litigation that should be considered by the Court under this factor.

Rule 23(b)(3)(C) requires the court to evaluate the desirability of concentrating the litigation in a particular forum. Due to the nature of the questions asserted by the Plaintiffs, Judge Toomer does not object to the current forum. Indeed, this should be a case against Judge Toomer only.

The last factor that courts are required to consider in relation to superiority is the difficulty that may be "encountered in the management of the class action." Fed. R. Civ. P. 23(b)(3)(D). A finding of unmanageability requires more than the case will be difficult to try or that the case involves novel challenges. *In re Domestic Air Transp. Antitrust Litig.,* 137 F.R.D. 677, 693 (N.D. Ga. 1991). Judge Toomer notes that neither a class action nor a suit naming all 159 probate judges within the State of Georgia as defendants is necessary to address the questions raised in Plaintiffs' Complaint. The challenged statute is either constitutional or it is not.

As "[t]he initial burden of proof to establish the propriety of class certification rests with the advocate of the class," *Rutstein,* 211 F.3d at 1233, Plaintiffs Motion to Certify Class should be denied based on their total failure to address the factors of Fed. R. Civ. P. 23(b)(3).

IV. CONCLUSION

For all of the foregoing reasons, Judge Toomer respectfully requests that Plaintiff's Motion to Certify Class be Denied.

Respectfully submitted, this 28th day of July, 2008.

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CERTIFICATE OF FONT TYPE, SIZE AND SERVICE

THIS IS TO CERTIFY that on the 28th day of July, 2008, I presented this document in Courier New, 12 point type in accordance with L.R. 5.1(C) and that I have served a copy of the foregoing **Defendant Pinkie Toomer's Brief in Opposition to Plaintiffs' Motion to Certify Class** in accordance with this court's CM/ECF automated system which shall forward automatic e-mail notification of such filing to the following attorney's of record:

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