

24CV00046

AWTON C. HEARD, JR.  
APR 24, 2025 03:04 PM

IN THE SUPERIOR COURT OF DECATUR COUNTY  
STATE OF GEORGIA

  
Cecilia Willis, Clerk  
Decatur County, Georgia

JUNE FAIRCLOTH, CHAD DOLLAR, )  
KRISTINA MARTIN, and LISA DASILVA )

Plaintiffs, )

v. )

CIVIL ACTION  
NO.: 24CV00046

CITY OF BAINBRIDGE; DECATUR )  
COUNTY; DECATUR COUNTY SCHOOL )  
DISTRICT; DECATUR BOARD OF )  
EDUCATION; and DECATUR COUNTY )  
BOARD OF TAX ASSESSORS )

Defendants, )

SAFER HUMAN MEDICINE, INC. )

Defendant-Intervenor. )

**ADOPTION OF PLAINTIFF'S MOTION FOR INTERLOCUTORY INJUNCTION  
AND TEMPORARY RESTRAINING ORDER**

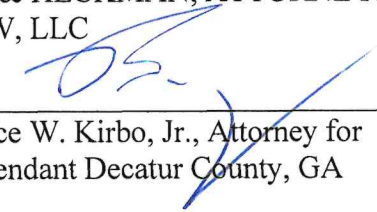
COMES NOW, Decatur County, Georgia, Defendant herein, and pleads it's adoption of Plaintiff's motion for interlocutory injunction and temporary restraining order as follows:

Defendant, Decatur County, Georgia has previously acknowledged that it did not comply with the Georgia Open Meetings Act with respect to the PILOT Agreement and the Project Agreement that have been identified in the various pleadings filed in this case. Defendant, Decatur County, Georgia has also acknowledged that it's vote on, adoption of, and execution of the PILOT Agreement and the Project Agreement are not binding on the County, a position which is consistent with the provisions of the Georgia Open Meetings Act. Defendant, Decatur County, Georgia, in a meeting duly noticed, called and published has disavowed and rescinded all provisions in the PILOT Agreement and the Project Agreement relating to the participation of Defendant, Decatur County, Georgia in the Safer Human Medicine project and believes, because of its violation of the Georgia Open Meetings Act, it has no remaining contractual obligations with regard to the Project

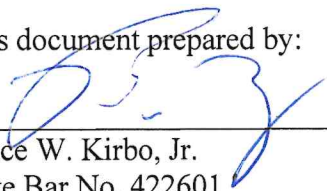
or to Safer Human Medicine, Inc. or to the other Defendants named in this civil action. Defendant, Decatur County, Georgia has previously, in its Answer, asked the Court to declare that the Project Agreement and the PILOT Agreement are invalid and of no legal effect. ACCORDINGLY, it is the position of Defendant, Decatur County, Georgia, given the declarations by Safer Human Medicine, Inc. that it can begin preparing for construction and operation of the Project, buttressed by the presumption of Defendant, Decatur County, Georgia that Safer Human Medicine, Inc. believes that the provisions in the Project Agreement and in the Pilot Agreement relating to Defendant Decatur County, Georgia remain as contractual obligations of Decatur County, Georgia, that it is proper for the Court to expeditiously grant Plaintiff's Motion and to issue the temporary restraining order and emergency interlocutory injunction requested by Plaintiffs in this matter.

This 24<sup>th</sup> day of April, 2025.

KIRBO & HECKMAN, ATTORNEYS  
AT LAW, LLC

By:   
Bruce W. Kirbo, Jr., Attorney for  
Defendant Decatur County, GA

This document prepared by:

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

**JUNE FAIRCLOTH, CHAD DOLLAR,  
KRISTINA MARTIN, and LISA DASILVA**

**Plaintiffs,**

**v.**

**CITY OF BAINBRIDGE; DECATUR  
COUNTY; DECATUR COUNTY SCHOOL  
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**Defendants.**

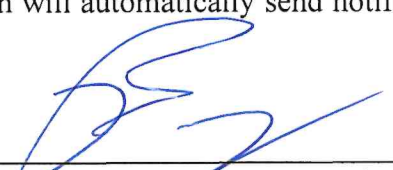
**SAFER HUMAN MEDICINE, INC.**

**Defendant-Intervenor.**

**CIVIL ACTION  
NO.: 24CV00046**

**CERTIFICATE OF SERVICE**

The undersigned attorney does hereby certify that he has on this 24<sup>th</sup> day of April, 2025, electronically filed this **ADOPTION OF PLAINTIFF'S MOTION FOR INTERLOCUTORY INJUNCTION AND TEMPORARY RESTRAINING ORDER** with the Clerk of the Court using the e-filing system, which will automatically send notification of such filing to the attorney(s) of record.

  
\_\_\_\_\_  
Bruce W. Kirbo, Jr., Attorney for  
Defendant Decatur County, Georgia

This document prepared by:

  
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