

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA**

FLORIDA STATE CONFERENCE OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE
(NAACP), as an organization and representative
of its members; *et al.*,

Civil No. 4:07cv402 SPM/WCS

Plaintiffs,

vs.

KURT S. BROWNING, in his official capacity as
Secretary of State for the State of Florida,

Defendant.

JOINT MOTION FOR STAY

On May 15, 2009, the parties advised the Court that they were engaged in discussions regarding the possible resolution of this case without the need for further litigation. (Doc. 198.) Those discussions have continued in a meaningful and encouraging way, and the parties anticipate a full amicable resolution of all outstanding issues. To facilitate this resolution, and to avoid unnecessary litigation efforts by the Court and the parties, the parties hereby jointly move the Court for a 90-day stay of all deadlines, including discovery, mediation, motion, and trial deadlines, reflected in the Court's Order for Discovery, Mediation, and Trial [doc. 177], the Order Granting Plaintiffs' Motion for Extension of Time [doc. 190], and the Order Granting Joint Motion to Extend Time and Revise the Pretrial Schedule [doc. 199].

This Court has broad discretion under the Federal Rules of Civil Procedure to schedule and efficiently adjudicate matters. *Perez v. Miami-Dade County*, 297 F.3d 1255, 1263 (11th Cir. 2002). In particular, the court has discretion to schedule matters in a manner most likely to avoid unnecessary costs and conserve resources. Entry of an order staying all deadlines in the case for 90 days is likely to further these ends.

Accordingly, in anticipation of a successful resolution to the case without further litigation, the parties move to stay all deadlines in the case for a period of 90 days from the dates most recently reflected in the Court's scheduling orders.

Dated: June 11, 2009

GREENBERG TRAUIG, P.A.

s/Glenn T. Burhans, Jr.

GLENN T. BURHANS, JR.

FLA. BAR NO. 605867

101 EAST COLLEGE AVENUE

TALLAHASSEE, FLORIDA 32301

TEL. (850) 222-6891

FAX (850) 681-0207

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

ROBERT A. ATKINS

D. MARK CAVE

LAUREN M. ROTHENBERG

1285 AVENUE OF THE AMERICAS

NEW YORK, NEW YORK 10019-6064

TEL. (212) 373-3000

FAX (212) 492-0289

**BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW**

JUSTIN LEVITT

J. ADAM SKAGGS

MYRNA PÉREZ

161 AVENUE OF THE AMERICAS, 12TH FLOOR

NEW YORK, NEW YORK 10013
TEL. (212) 998-6730
FAX (212) 995-4550

ADVANCEMENT PROJECT
ELIZABETH S. WESTFALL
1730 M. STREET, NW, SUITE 910
WASHINGTON, DC 20036
TEL. (202) 728-9557
FAX (202) 728-9558

PROJECT VOTE
YOLANDA SHEFFIELD
739 8TH STREET SE, SUITE 202
WASHINGTON, DC 20003
TEL. (202) 553-5415
FAX (202) 543-3675

Counsel for Plaintiffs

GRAYROBINSON, P.A.

s/Allen Winsor
ALLEN WINSOR
Peter Antonacci
Andy V. Bardos
Post Office Box 11189
Tallahassee, Florida 32302-3189

Counsel for Defendant
Kurt Browning