

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

INDIANA DEMOCRATIC PARTY,)	
<i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
vs.)	CAUSE NO: 1:05-CV-0634-SEB-VSS
)	
TODD ROKITA, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	
)	
WILLIAM CRAWFORD, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
MARION COUNTY ELECTION BOARD,)	
)	
Defendant,)	
and)	
)	
STATE OF INDIANA,)	
)	
Intervenor.)	

DEMOCRATS’ MOTION FOR SUMMARY JUDGMENT

The Indiana Democratic Party and the Marion County Democratic Central Committee (“Democrats”), by their undersigned counsel, move this Court pursuant to Rule 56(a) of the Federal Rules of Civil Procedure for summary judgment on the grounds that the pleadings, depositions, answers to interrogatories, affidavits, and stipulations of the parties show that there is no genuine issue as to any material fact and that Democrats are entitled to judgment as a matter of law declaring that the photo identification requirements of Senate Enrolled Act No. 483 are illegal and

unconstitutional on their face, and therefore, void and unenforceable, and permanently enjoining their implementation and enforcement, for the myriad reasons set forth in their supporting Memorandum submitted contemporaneously herewith.

WHEREFORE, Democrats move that this Court enter judgment declaring that the photo identification requirements of Senate Enrolled Act No. 483 are unconstitutional on their face, and in violation of the Civil Rights Act of 1964, 42 U.S.C. §1971(a)(2)(A) and (B), enjoining their implementation and enforcement, and granting them any further relief to which the Court may deem them entitled, including their costs and reasonable attorney fees pursuant to 42 U.S.C. §1988.

Respectfully submitted,

s/ William R. Groth

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s/ Geoffrey S. Lohman

Geoffrey S. Lohman

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of October, 2005, a copy of the foregoing pleading was filed electronically upon the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

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