

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

BARBARA H. LEE, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,
et al.,

Defendants.

Civil Action No. 3:15-CV-357-HEH

**JOINT MOTION TO VOLUNTARILY DISMISS THE NON-PARTY REGISTRARS'
MOTION TO QUASH SUBPOENAS**

The Non-Party Registrars and Plaintiffs Barbara H. Lee, *et al.*, notify this Court that an agreement has been reached concerning the subpoenas issued to the Non-Party Registrars.

The Non-Party Registrars hereby voluntarily dismiss their Motion to Quash (ECF No. 103). In exchange for the dismissal of their Motion, the Non-Party Registrars and the Plaintiffs have agreed to the following:

1. The Non-Party Registrars will produce on a rolling basis documents responsive to Requests 7, 9, and 10;
2. The Non-Party Registrars agree to make every effort to produce documents responsive to Request 7 on or before December 18, 2015;
3. The Non-Party Registrars will complete their production of all responsive documents no later than December 22, 2015;
4. Upon receipt of the documents responsive to Requests 7, 9, and 10, or responses stating no responsive documents are in the specific Registrar's possession, the Plaintiffs agree to

deem that the Registrars have fully complied with and satisfied the subpoenas served upon them; and

5. The Plaintiffs also agree to not demand any further compliance with the Non-Party Registrars' subpoenas.

The Parties respectfully request that the Court enter the attached Consent Order dismissing the Non-Party Registrars' Motion to Quash Subpoenas; ordering that the Non-Party Registrars produce documents responsive to Requests 7, 9, and 10; and prohibiting Plaintiffs from demanding anything further from the Non-Party Registrars in response to the Non-Party Registrars' subpoenas.

DATED: December 14, 2015

By: /s/ Aria C. Branch

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CERTIFICATE OF SERVICE

On December 14, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following:

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