

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
EASTERN DIVISION**

UNITED STATES OF AMERICA

PLAINTIFF

VS.

CIVIL ACTION NO. 4:05CV33TSL-LRA

**IKE BROWN; NOXUBEE COUNTY
DEMOCRATIC EXECUTIVE COMMITTEE;
NOXUBEE COUNTY ELECTION COMMISSION**

DEFENDANTS

MEMORANDUM OF BROWN AND NCDEC PROPOSED ORDER

The proposed order of Brown and NCDEC is submitted for the Court's consideration:

1. It is an order covering only the run-off because the parties were unable to agree on permanent relief and a determination of same by the Court cannot be appropriately made without an evidentiary hearing.
2. The Referee proposed by these Defendants serves as an observer for the Court and reports to the Court as to compliance by Brown and NCDEC (paragraphs 3-12).
3. Paragraphs 13-22 are taken from the government's proposed order. In paragraph 19, Defendants added the word "knowingly."

Respectfully submitted this 13th day of August, 2007.

**IKE BROWN and the NOXUBEE COUNTY
DEMOCRATIC EXECUTIVE COMMITTEE**

BY: /s/ Wilbur O. Colom
WILBUR O. COLOM
(MS Bar No. 6403)
EDWARD L. PLEASANTS, III
(MS Bar No. 101857)

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CERTIFICATE OF SERVICE

I, Wilbur O. Colom, hereby certify that on August 13, 2007, I electronically filed the foregoing *Memorandum in Support of Brown and NCDEC Proposed Order* with the Clerk of the Court using the ECF system which sent notification of such filing to all counsel of record.

/s/ Wilbur O. Colom

Wilbur O. Colom

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