

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

SHELBY COUNTY, ALABAMA,

Plaintiff-Appellant,

v.

ERIC H. HOLDER, JR.,
in his official capacity as
ATTORNEY GENERAL OF THE
UNITED STATES,

Defendant-Appellee,

and

ALABAMA STATE CONFERENCE OF
THE NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
INC., EARL CUNNINGHAM, KENNETH
DUKES, WILLIE GOLDSMITH, SR.,
BOBBY LEE HARRIS, ALBERT JONES,
HARRY JONES, ERNEST MONTGOMERY,
MARY PAXTON-LEE, BOBBY PIERSON,
ANTHONY VINES, and WILLIAM
WALKER,

Intervenor Defendant-
Appellees.

No. 11-5256

STATEMENT OF ISSUES TO BE RAISED

Appellant Shelby County, Alabama, hereby states that it intends to raise the following issue in this appeal: Do Sections 4(b) and/or 5 of the Voting Rights Act

exceed Congress's enforcement authority under the Fourteenth and Fifteenth Amendments to the United States Constitution and violate the Tenth Amendment and Article IV of the United States Constitution?

Dated: October 4, 2011

Respectfully submitted,

/s/ Bert W. Rein

Bert W. Rein

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CERTIFICATE OF SERVICE

I hereby certify that on October 4, 2011, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send notice of such filing to the following registered CM/ECF users:

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