

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NORTH CAROLINA STATE
CONFERENCE OF THE NAACP, *et al.*,

Plaintiffs,

v.

PATRICK LLOYD MCCRORY, in his
official capacity as the Governor of North
Carolina, *et al.*,

Defendants.

**JOINT STATUS REPORT
REGARDING VOTER PHOTO ID
CLAIMS**

Civil Action No. 1:13-cv-658

LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA, *et al.*,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, *et
al.*,

Defendants.

Civil Action No. 1:13-cv-660

UNITED STATES OF AMERICA,

Plaintiff,

v.

THE STATE OF NORTH CAROLINA, *et
al.*,

Defendants.

Civil Action No. 1:13-cv-861

**JOINT STATUS REPORT
REGARDING VOTER PHOTO ID CLAIMS**

On August 17, 2015, Plaintiffs filed a joint status report regarding the photo voter ID claims in this case. *See* Case No. 13-CV-658, ECF No. 363. As represented in that report, Plaintiffs United States, the NAACP Plaintiffs, and the Duke Plaintiff-Intervenors are now providing an update to the Court on the status of the parties' discussions regarding these claims.

On September 16, 2015, counsel for the United States, the NAACP Plaintiffs, and the Duke Plaintiff-Intervenors had a productive meeting with counsel for Defendants in Raleigh to discuss possible resolution of the voter photo ID claim.¹ The meeting followed several detailed letters and email correspondence from Plaintiffs to Defendants identifying issues and concerns relating to the State's interpretation, implementation, and plans for voter education regarding the requirement and the Reasonable Impediment Declaration Exception recently added to the voter photo ID requirement. Following the September 16 meeting, Plaintiffs have agreed to provide Defendants with a draft proposed agreement that might resolve Plaintiffs' claims regarding the State's voter photo ID requirement.

In light of the foregoing, Plaintiffs propose that the parties continue discussions on these matters and that Plaintiffs provide a further update to the Court by Friday, October 16.

¹ The League of Women Voters Plaintiff group did not bring claims regarding voter photo ID in federal court. The United States, the NAACP Plaintiff group, and the Duke Plaintiff-Intervenors have claims against North Carolina's voter photo ID law.

Dated: September 18, 2015

Respectfully submitted,

By: /s/ Adam Stein

Penda D. Hair
Edward A. Hailes, Jr.
Denise D. Lieberman
Donita Judge
Caitlin Swain
ADVANCEMENT PROJECT
Suite 850
1220 L Street, N.W.
Washington, DC 20005
Phone: (202) 728-9557
phair@advancementproject.com

Irving Joyner (N.C. State Bar # 7830)
P.O. Box 374
Cary, NC 27512
Phone: (919)319-353
ijoyner@nccu.edu

Adam Stein (N.C. State Bar # 4145)
Of Counsel
TIN FULTON WALKER & OWEN, PLLC
312 West Franklin Street
Chapel Hill, NC 27516
Phone: (919) 240-7089
astein@tinfulton.com

Daniel T. Donovan
Bridget K. O'Connor
Susan M. Davies
Michael A. Glick
K. Winn Allen
Jodi Wu
KIRKLAND & ELLIS LLP
655 Fifteenth St., N.W.
Washington, DC 20005
Phone: (202) 879-5000
ddonovan@kirkland.com

Attorneys for Plaintiffs in North Carolina State Conference of the NAACP, et al. v. McCrory, et al.

/s/ John A. Russ IV

Gill P. Beck (State Bar # 13175)
Special Assistant United States
Attorney
OFFICE OF THE UNITED
STATES ATTORNEY
United States Courthouse
100 Otis Street
Asheville, NC 28801
Telephone: (828) 259-0645
E-mail: gill.beck@usdoj.gov

T. Christian Herren, Jr.
John A. Russ IV
Catherine Meza
David G. Cooper
Spencer R. Fisher
Jenigh J. Garrett
Elizabeth Ryan
Avner Shapiro
Ernest A. McFarland
Attorneys, Voting Section
Civil Rights Division
U.S. DEPARTMENT OF JUSTICE
Room 7254-NWB
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Telephone: (800) 253-3931
E-mail: john.russ@usdoj.gov

Attorneys for Plaintiffs in United States v. North Carolina, et al.

Marc E. Elias
Bruce V. Spiva
John M. Devaney
Elisabeth C. Frost
Joseph Wenzinger
Amanda Callais
700 Thirteenth St., N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211
E-mail: melias@perkinscoie.com
Email: bspiva@perkinscoie.com
E-mail: jdevaney@perkinscoie.com
E-mail: efrost@perkinscoie.com

By: */s/ Edwin M. Speas, Jr.*

Edwin M. Speas, Jr. (State Bar # 4112)
John W. O'Hale (State Bar # 35895)
Caroline P. Mackie (State Bar # 41512)
P.O. Box 1801 (27602-1801)
301 Fayetteville St., Suite 1900
Raleigh, NC 27601
Telephone: (919) 783-6400
Facsimile: (919) 783-1075
E-mail: espeas@poynerspruill.com
E-mail: johale@poynerspruill.com
E-mail: cmackie@poynerspruill.com

Joshua L. Kaul
Wisconsin Bar No. 1067529
1 East Main Street, Suite 201
Madison, WI 53703
Telephone: (608) 294-4007

Facsimile: (608) 663-7499
JKaul@perkinscoie.com

Attorneys for Plaintiff-Intervenors in League of Women Voters of North Carolina, et al. v. North Carolina, et al.

CERTIFICATE OF SERVICE OF DISCOVERY

I hereby certify that on September 18, 2015, I electronically filed the foregoing **Joint Status Report Regarding Voter Photo ID Claims**, using the CM/ECF system in case numbers 1:13- cv-658, 1:13- cv-660, and 1:13-cv-861, which will send notification of such filing to all counsel of record.

/s/ John A. Russ IV

JOHN A. RUSS IV

U.S. Department of Justice

Civil Rights Division - Voting Section

950 Pennsylvania Avenue, N.W.

Washington, DC 20530

Phone: (800) 253-3931

Email: john.russ@usdoj.gov

General Information

Court	United States District Court for the Middle District of North Carolina; United States District Court for the Middle District of North Carolina
Federal Nature of Suit	Civil Rights - Voting[441]
Docket Number	1:13-cv-00660