

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

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

Plaintiffs,)

v.)

1:13CV658

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

Defendants.)

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

Plaintiffs,)

and)

LOUIS M. DUKE, *et al.*,)

Plaintiffs-Intervenors,)

v.)

1:13CV660

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

Defendants.)

UNITED STATES OF AMERICA,)

Plaintiff,)

v.)

1:13CV861

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

Defendants.)

MOTION TO SEAL

Defendants, pursuant to Fed. R. Civ. P. 5.2, Local Rule 5.4, and Section T of the CM/ECF Policy Manual, move the Court to:

1. Seal documents DX 51, “Forward Together Moral Movement Timeline,” and DX 53, “NC NAACP State Conference Voter Empowerment Expenses 2010-2014,” which were submitted to the Court by Defendants and admitted into evidence on July 30, 2015.

2. These exhibits are relevant to these matters in that they illustrate the resources utilized and efforts undertaken by the NAACP Plaintiff’s organization to mobilize voters during previous election cycles.

3. Defendants do not believe DX 51 or DX 53 contain “highly confidential” information as that term is defined in the Court’s Protective Order entered in this matter, however, Defendants do not object to Plaintiffs’ request that these documents be filed under seal.

4. Counsel for Defendants conferred with counsel for Plaintiffs prior to filing this motion. Plaintiffs are aware that, as the party claiming confidentiality, they will have fourteen (14) days to file a brief providing all of the information in support of this Motion to Seal as required by paragraphs (b) and (c) of Local Rule 5.4. Plaintiffs will be responsible for filing any redacted, public version of these documents required by Local Rule 5.4

WHEREFORE, Defendants consent to the Court entering an Order providing that admitted exhibits DX 51 and DX 53 be filed under seal.

Respectfully submitted, this the 8th day of September, 2015.

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*appearing pursuant to Local Rule 83.1(d)

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CERTIFICATE OF SERVICE

I, Thomas A. Farr, hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will provide electronic notification of the same to the following:

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This the 8th day of September, 2015.

OGLETREE, DEAKINS, NASH
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/s/ Thomas A. Farr

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22191489.1

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