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.	**NAACP PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION** 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

INTRODUCTION

Less than a month before the NAACP Plaintiffs and other plaintiffs were to present the substantial evidence they had collected demonstrating that the photo identification voting requirement imposed by H.B. 589 placed a substantial and disproportionate burden on African Americans and Hispanics, the North Carolina General Assembly amended the law, creating certain undefined exceptions for those voters who do not possess one of the limited forms of qualifying ID. To be sure, the General Assembly did not eliminate the photo identification requirement; indeed, a State Board of Elections spokesperson recently declared: "It's important voters understand this [new] exception does not swallow the rule. Photo ID is still required to vote a regular ballot in-person beginning in 2016."

While the recent amendment offers the promise—but not guarantee—that voters who do not possess a qualifying ID can vote in future North Carolina elections by virtue of a "reasonable impediment declaration," it does not alleviate the burdens faced by all voters. Nor does it provide critical information regarding the scope and interpretation of the recently created exceptions or explain how the State intends to provide necessary education and training to prospective voters, poll workers, and local election officials. This education and training is important in light of the State's "soft rollout" of the photo identification requirement during the 2014 election cycle—a program which was undertaken over the objections of the NAACP Plaintiffs at the preliminary injunction phase of these proceedings.

Because even the modified photo ID requirement threatens to burden voters—and to disproportionately burden African-American and Hispanic voters who are less likely to possess a qualifying ID—the NAACP Plaintiffs' challenge is not moot and the Defendants' motion to dismiss should be denied. In the alternative, in light of the legislature's eleventh-hour revision to the law in advance of trial, the NAACP Plaintiffs should be given leave to supplement their complaint under Federal Rule of Civil Procedure 15(d).

BACKGROUND

On June 25, 2013, the Supreme Court decided *Shelby County v. Holder*, which invalidated the pre-clearance requirement of the Voting Rights Act of 1965. *See* 133 S. Ct. 1612. In the immediate aftermath of *Shelby County*—and with the barest of legislative debate and process—the North Carolina General Assembly enacted sweeping limitations on the franchise, including (i) one of the strictest voter-identification requirements in the nation (the "Photo ID Requirement"); (ii) the elimination of same-day voter registration and pre-registration; (iii) reductions to early-voting opportunities; (iv) the prohibition on the counting of out-of-precinct provisional ballots; and (v) the expansion of the number of poll observers and individuals who can challenge ballots. The law, referred to as H.B. 589, was signed into law on August 12, 2013, and is designated as S.L. 2013-381.

With regard to the Photo ID Requirement, H.B. 589 required North Carolinians who cast ballots in person to provide one of the following forms of identification: (1) a North Carolina driver's license, learner's permit, or provisional license; (2) a special

identification card for non-operators; (3) a United States passport; (4) a tribal enrollment card issued by a federally recognized tribe or tribe recognized in North Carolina; (5) a driver's license or non-operator's identification card issued by another state (subject to certain limitations); or (6) a military or veterans' identification card. For all but the military and veteran forms of identification, H.B. 589 required that a voter present an unexpired form of identification.[1]

A group of plaintiffs led by the North Carolina State Conference of the NAACP (the "NAACP Plaintiffs") immediately challenged H.B. 589, including the Photo ID Requirement, in this Court. Subsequent challenges were filed by the United States as well as a group of plaintiffs led by the League of Women Voters (the "LWV Plaintiffs").[2]

In the nearly two years since these cases were filed, the parties have engaged in substantial discovery regarding the Photo ID Requirement and other provisions of H.B. 589, including more than 170 depositions and the production of more than 700,000 documents. Discovery demonstrated—as the Plaintiffs alleged—that the Photo ID Requirement imposes a substantial and disproportionate burden on African Americans and Hispanics and, further, that the State's efforts to assist voters in obtaining one of the necessary forms of ID were unsuccessful and plagued with difficulties and errors.

On June 22, 2015—just three weeks before trial was to commence on the Plaintiffs' challenges to the Photo ID Requirement and other provisions of H.B. 589—the General Assembly passed H.B. 836. Recognizing the weight of the evidence showing

[1] The law provided an exception for voters over the age of 70, who could provide an expired form of ID if the ID was not expired on the voter's 70th birthday.

[2] The United States challenged the Photo ID Requirement in this Court. The LWV Plaintiffs challenged the Photo ID Requirement in state court.

that the Photo ID Requirement disproportionately burdened African Americans and Hispanics, and that the State's implementation efforts were woefully insufficient, the General Assembly modified the Photo ID Requirement. While many provisions of H.B. 589—including the Photo ID Requirement—remains in place, H.B. 836 allows voters who do not present one of the required forms of identification at the voting site to (a) request an absentee ballot from an early voting location, or (b) fill out a reasonable impediment declaration ("RID") in order to cast a provisional ballot. Additionally, H.B. 836 provides that expired North Carolina driver licenses and non-operator ID cards are permissible forms of identification, provided the ID expired less than four years before the election.

Following telephonic conferences with the Court, the parties agreed to defer consideration of the Plaintiffs' challenges to the Photo ID Requirement during the trial that commenced on July 13, 2015. The Defendants subsequently moved to dismiss the Plaintiffs' challenges to the Photo ID Requirement as moot and the NAACP Plaintiffs now oppose that motion.

ARGUMENT

I. PLAINTIFFS' CLAIMS ARE NOT MOOT BECAUSE THE PHOTO ID PROVISIONS OF H.B. 589 REMAIN IN FORCE.

A. The Photo ID Requirement Has Been Modified, But Not Repealed.

The NAACP Plaintiffs' challenge to the Photo ID Requirement is not moot first and foremost because the North Carolina legislature has not repealed the photo identification provisions of H.B. 589. Rather, under H.B. 836, voters are still required to

present a photo ID in order to cast a regular ballot in North Carolina's elections; H.B. 836 neither removed nor replaced H.B. 589 from the State's books.

Lest there be any doubt, a spokesperson for the State Board of Elections recently made clear: "The reasonable impediment declaration is not an opportunity to evade the law . . . . It's important voters understand this exception does not swallow the rule. Photo ID is still required to vote a regular ballot in-person beginning in 2016." (Nicole Caporaso, *Law creates alternatives to photo ID for voting*, The Daily Tar Heel, July 2, 2015.[3]) Similarly, David Lewis, Chairman of the Elections Committee of the North Carolina House of Representatives and a leading proponent of H.B. 589, made clear in a blog post published on the day that H.B. 836 was enacted that it was merely an "an adjustment to the voter ID statute." (David Lewis, *Voter ID Law Update*, June 22, 2015.[4]) Representative Lewis further explained: "There has been considerable angst, in the last few days, over claims we have weakened our voter ID laws. I reject that claim." (*Id.*)[5]

In addition to these public statements from officials responsible for enacting and administering the modified law, the State continues to make plain that the Photo ID Requirement remains alive and well. For instance, the voter registration form that the State ***is still using today*** states that there is a "Photo ID Requirement[ ]" for voting and that "Effective January 1, 2016, North Carolina voters will need to show a photo ID when

[3] http://www.dailytarheel.com/article/2015/07/law-creates-alternatives-to-photo-id-for-voting
[4] http://www.davidlewis.org/voter_id_law_update
[5] Similarly, in an affidavit submitted by the League of Women Voters plaintiffs in their challenge to the Photo ID Requirement in North Carolina state court, Kathryn Fellman, a director for a non-profit focusing on voting education and outreach, explained under oath that when she called the State Board of Elections to explain that the SBOE's website contained certain outdated information regarding the Photo ID Requirement, she was told that "to the State Board, voter ID is still the law in North Carolina." *See* ECF No. 306, Case No. 13-cv-660, Ex. 2.

voting in person." (Trial Ex. PX 212A.) The form makes no mention of the RID exception, nor of the fact that the state will accept expired licenses up to four years after expiration. (*See id.*)[6] Similarly, the State continues to advertise the Photo ID Requirement on both the main website of the SBOE as well as the separate website devoted to the photo ID law. For instance, the front page of the SBOE's dedicated voter ID website affirms: "Beginning in 2016, North Carolina will require voters to show an acceptable form of photo identification when presenting to vote in person at the polls." (Vote NC, http://voterid.nc.gov/ (last visited July 23, 2015) (emphasis omitted).) The site's front page also features a downloadable full-color poster which reads: "In 2016, you will need a photo ID to vote in NC. Do you have one of these?" *Id.* The poster includes visual depictions of the acceptable forms of ID under the amended H.B. 589 and does not discuss the potential absentee or RID exceptions. Although the homepage also refers to certain "exceptions" to the Photo ID Requirement, such disclaimer is featured in much smaller print, and requires additional navigation to a separate "Frequently Asked Questions" page to access information regarding the specific exception.

B. Plaintiffs' Photo ID Claims Would Be Moot Only If The Photo ID Requirement Is Repealed.

A case is mooted by subsequent events if those events make it "impossible for [a] court to grant 'any effectual relief whatever' to a prevailing party." *Church of Scientology of Cal. v. United States*, 506 U.S. 9, 12 (1992) (citing *Mills v. Green*, 159 U.S. 651, 653 (1895)). As movants for dismissal on a theory of mootness, Defendants bear a heavy burden. *Chesapeake Bay Found., Inc. v. Gwaltney of Smithfield, Ltd.*, 890

[6] The Executive Director of the State Board of Elections confirmed this during trial on July 22, 2015.

F.2d 690, 697 (4th Cir. 1989) ("The burden on the defendant—to prove that the issue has become moot because of corrective action it has taken—is a heavy one."). Defendants have failed to carry that burden because they have not demonstrated that H.B. 836 "removes the basis for plaintiffs' claims." *McCartney ex. rel. McCartney v. Cansler*, 608 F. Supp. 2d 694, 702 (E.D.N.C. 2009).

Here, the State's failure to repeal the Photo ID Requirement dooms its motion to dismiss the NAACP Plaintiffs' claims. Defendants base their motion to dismiss on their spurious assumption that "[t]he amendments enacted by SL 2015-103 [H.B. 836] eliminate the possibility that [the] harm, from which plaintiffs seek relief, can even occur." Defs.' Mem. at 14. But that assertion is incorrect. Because H.B. 589 remains on North Carolina's statute books, the State has not "remove[d] the basis for plaintiffs' claims." *McCartney*, 608 F. Supp. 2d at 702.

The cases cited by Defendants in their memorandum are inapposite or support a finding of an absence of mootness. For instance, in *Brooks v. Vassar*, while the Fourth Circuit held that plaintiffs' claims were moot because the state amended the statute at issue, the parties there actually agreed that the amendments "fully implemented the district court's judgment" in favor of the plaintiffs *and* there was "no practical likelihood" that the state would repeal the amendments and restore the challenged provisions. 462 F.3d 341, 348 (2006). Those facts are distinguishable from the legislation at hand, which did not repeal the Photo ID Requirement. While the Plaintiffs' challenge *might* be moot if the State *actually repealed* H.B. 589, the State has done no such thing to date.

Other decisions from the Fourth Circuit and this Court support the same conclusion. In *Reyes v. City of Lynchburg*, the court of appeals held that the plaintiffs' challenge to a city ordinance was moot because "the City had *repealed* [the ordinance] and *promised not to reenact a similar one*." 300 F.3d 449, 453 (4th Cir. 2002) (emphases added). The Fourth Circuit there expressly concluded that "[t]here is no reasonable expectation that [the City] will reenact the ordinance." *Id.* And in *Valero Terrestrial Corp. v. Paige*, that court found moot a dormant commerce clause challenge to a state waste disposal statute because the newly enacted amendments "*repealed the former requirement*" at issue. 211 F.3d 112, 116 (4th Cir. 2000) (emphasis added); *see also id.* ("[W]e remain satisfied that statutory changes that discontinue a challenged practice are usually enough to render a case moot . . . .") (internal quotation marks omitted).

Likewise, this Court found in *Alpha Iota Omega Christian Fraternity v. Moeser* that a First Amendment challenge to a university regulation governing official recognition of student groups was moot because, before the court entered judgment, the university amended the regulation and *granted the plaintiffs the relief they requested*. 2006 WL 1286186, at *3 (M.D.N.C. May 4, 2006); *see also McCartney*, 608 F. Supp. 2d at 702 ("Legislation that merely touches upon issues involved in litigation does not, however, render an action moot. *It is only where new legislation removes the basis for a claim or fully satisfies the claim that dismissal for mootness is appropriate.*") (emphasis added). Each of those cases is inapposite here because the State's challenged photo ID laws remain in full force.

Instead, this case is akin to *Northeastern Florida Chapter of Associated General Contractors of America v. City of Jacksonville*, 508 U.S. 656 (1993), which concerned a trade association's challenge to the city's set-aside program for minority businesses. *Id.* at 658-59. The Supreme Court held that intervening amendments to the program did not render the case moot, explaining: "The gravamen of petitioner's complaint is that its members are disadvantaged in their efforts to obtain city contracts. The new ordinance may disadvantage them to a lesser degree than the old one, but insofar as it accords preferential treatment . . . it disadvantages them in the same fundamental way." *Id.* at 662. The same is true here where the General Assembly's amendment partially *ameliorates*—but does not *eliminate*—the Photo ID Requirement. While "it is undoubtedly a commendable thing when the people's representatives are able, through the legislative process, to defuse a potentially needless constitutional litigation," *Hill v. Kemp*, 478 F.3d 1236, 1243 (10th Cir. 2007), where the new legislation continues to impose burdens on the plaintiffs, "the case is not moot." *Id.*

II. THE UNDEFINED IMPLEMENTATION OF THE PHOTO ID REQUIREMENT STILL POTENTIALLY THREATENS TO IMPOSE DISPROPORTIONATE BURDENS ON PROTECTED CLASSES.

The NAACP Plaintiffs' claims are also not moot because the Photo ID Requirement, even as modified, threatens to place a disproportionate burden on African Americans and Hispanics. As the NAACP Plaintiffs allege in their Second Amended Complaint, the Photo ID Requirement imposes "real and substantial burdens" on African Americans and Hispanics, who "will encounter longer lines and . . . undue delay" at the polls. (2nd Am. Compl., ¶¶ 132-133, ECF No. 52.) These populations will be forced to

go through a separate process—and endure the longer waiting times that it entails—to execute the new declarations if they lack a qualifying ID. Such burdens will disproportionately fall on African-American and Hispanic voters, "who are less likely than other members of the electorate to possess the required forms of identification and also face disproportionately greater burdens in obtaining such identification." (*Id.* ¶ 7.) These voters will face the unenviable choice of either undertaking to obtain a form of identification that was already elusive to them or subjecting themselves to being singled out at polling places, subjected to additional wait times and delays, and generally being made to feel like second-class citizens during the voting process. (*See id.* ¶¶ 81-86.) Moreover, the modified Photo ID Requirement does not alleviate the "distinction between absentee and in-person voters," as the former are still not required to present photo identification or to fill out a reasonable impediment declaration "at any point during the voting process." (*Id.* ¶ 87.)

The continued threat of the modified Photo ID Requirement is particularly formidable given the dearth of guidance provided by the State with regard to the interpretation of the RID exception as well as the State's plans with regard to educating the public and training poll workers and county boards of elections ("CBOEs") with regard to the modified requirement. To date, the SBOE has not promulgated any rules or other guidance regarding the RID exception.

Interpretation. As an initial matter, the State has not set forth how the law will be interpreted by the SBOE or the respective CBOE. In particular, the scope of the RID

exception remains vague and subject to interpretation in such a manner that would burden African-American and Hispanic voters.

The State has argued that its modified law is modeled off of a South Carolina statute (Act R54), which includes a provision allowing for voters to execute a reasonable impediment affidavit, and which was upheld by a three-judge panel during the former pre-clearance regime. *See South Carolina v. United States*, 898 F. Supp. 2d 30 (D.D.C. 2012). However, a critical factor in the three-judge panel's approval of the South Carolina statute was the formal legal opinion and testimony of "two officials [who] play critical and complementary roles in the interpretation and implementation of Act R54: the Attorney General of South Carolina and the Executive Director of the South Carolina State Election Commission." *Id.* at 35. Indeed, the panel pointed to the Executive Director's testimony "that she follows the interpretation of South Carolina law offered by the Attorney General of South Carolina" and noted that she had "furnished specific assurances about how the reasonable impediment provision would be implemented." *Id.* at 35-36. "Most importantly for present purposes," the district court emphasized, "the interpretation of the law rendered by the responsible South Carolina officials has established that Act R54 will continue to permit voting by registered voters who have the non-photo voter registration card, so long as the voter states the reason for not having obtained a photo ID. As a result, Act R54 will deny *no* voters the ability to vote and have their votes counted if they have the non-photo voter registration card that could be used to vote under pre-existing South Carolina law." *Id* at 36. The court thus "accept[ed] and adopt[ed], as a condition of pre-clearance, the expansive interpretation offered by the

South Carolina Attorney General and the South Carolina State Election Commission," concluding such "understanding [was] central to [its] resolution of the case." *Id.* at 37.

Here, North Carolina has provided nothing approaching such official guidance. While the State alleges that "the statute itself" describes what can be considered a "reasonable impediment," ambiguity nonetheless persists. *See* Mot. at 7 n.2. For instance, the modified law provides that a declaration that is "nonsensical" or "merely denigrate[s] the photo identification requirement" will not suffice as a reason to not furnish a qualifying ID. The meaning of that statutory language is not self-evident and is likely to be the subject of much administrative and judicial gloss. Moreover, the Executive Director of the North Carolina SBOE has not offered any confirmation that she intends to follow the legislative language, nor that she is committed to an expansive interpretation of the RID exception (as were South Carolina election officials).

Education. In addition to open questions regarding interpretation of the modified requirement, the State has provided little explanation for how it intends to educate voters regarding the modifications to the Photo ID Requirement or the availability of the RID exception. This is notable given the substantial efforts that the State undertook—***over the NAACP Plaintiffs' objections***—to educate voters as part of a "soft rollout" in 2014 on the fact that they *would* need Photo ID to participate in elections in 2016. These efforts included, among other things:

- hiring "Election Specialists" at the State Board of Elections to conduct voter education and other outreach;
- developing substantial promotional materials that depict acceptable forms of photo ID—versions of which continue to appear on the SBOE's website;

- asking voters during the 2014 election if they had a photo ID, informing those voters who did not have an ID that they would need such ID in 2016, and requiring those voters to fill out an affidavit acknowledging this 2016 requirement;

- sending mailings to those voters who signed affidavits in 2014 instructing them that they would need ID in 2016, and performing additional follow-up with those voters;

- preparing an additional mailing to all registered voters who were not matched to a DMV-issued ID (tens of thousands of letters in total) explaining that they would need a photo ID to vote in 2016; and

- developing a website (http://voterid.nc.gov/) dedicated to the photo ID requirement.

These substantial efforts—none of which made mention of the RID exception (which was not passed into law until last month)—threaten to leave members of the public with the distinct impression that they will need a photo ID in 2016, or they will be unable to vote. The State's efforts have thus created confusion that may dissuade prospective voters from going to the polls in the first instance, and may create a new hassle at the polls for those who do. It is therefore critical that the State establish how it intends to address the issue of voter education to address this implementation hazard.

Training and Rules. By the same token, the State has not offered any indication as to how it intends to train CBOEs or poll workers regarding the modifications to the Photo ID Requirement, nor has it set forth rules governing how the law will be implemented on the ground. For example, the State has not explained how it plans to notify and train CBOEs or poll workers as to the changes in the voter ID law, nor has it clarified how much training those groups will receive and who will provide the training. The State has

also provided no information regarding other core implementation elements of the law, such as:

- what the RID form will look like and what languages it will be available in;
- whether the form will be uniform statewide;
- whether the State intends to develop promotional materials regarding the RID exception, where such materials will be distributed, and what such materials will look like;
- whether voters who use the form will have to obtain the signature of a notary (as in South Carolina), and if so, who will provide the notary and what steps will be taken if a notary is unavailable;
- whether voters who use the RID exception will have to wait in (or will be placed in) a separate line at the polls, and whether RID voters will have to wait in multiple lines at the polls; and
- how the SBOE and CBOEs plan to address lines at the polls—which will already be lengthy in light of H.B. 589's cuts to early voting—due to the additional explanations that will have to be performed at the polling unit and the filling out of the RID.

Once again, the State's lack of explanation regarding these measures distinguishes North Carolina from South Carolina, which had already developed a draft reasonable impediment form that voters would complete at the polling place. Indeed, the three-judge panel pointed to South Carolina's "repeated[] emphasi[s] to the Court that it will implement the reasonable impediment process in a way that alleviates material burdens," and "base[d] [its] decision on that understanding of how the law will be implemented." *Id.* at n.8. North Carolina has offered no such guidance here.

The State's failure to develop and announce rules and regulations for the RID exception is particularly salient given the proximity of these changes to the upcoming Presidential primary elections in March 2016. Once again, the panel's decision in *South*

Carolina v. United States is instructive. There, notwithstanding South Carolina's official state representations regarding its interpretation and plan for implementation, the three-judge panel declined to approve South Carolina's law for the next election, concluding that South Carolina's photo ID requirement could not be properly implemented in time. Specifically, the court acknowledged that "a large number of difficult steps" would be required, including (1) informing more than 100,000 South Carolina voters; (2) training several thousand poll workers and managers about "the intricacies and nuances of the law"; (3) creating new forms; and (4) posting and mailing new notices. All of the same "difficult steps" are required in North Carolina—and then some (particularly given the "soft rollout" in 2014). As a result, and given the lack of official guidance from either the State's Attorney General or the SBOE, North Carolina's modified law threatens chaos in advance of the primary elections next spring.

III. IN ANY EVENT, PLAINTIFFS SHOULD BE GRANTED LEAVE TO SUPPLEMENT THEIR PLEADINGS.

At a minimum, the Court should grant the Plaintiffs leave to supplement their pleadings under Fed. R. Civ. P. 15(d). Under that rule, "the court may, on just terms, permit a party to serve a supplemental pleading setting out any transaction, occurrence, or event that happened after the date of the pleading to be supplemented." *Id.* The State's passage of H.B. 836 is just such a "transaction, occurrence, or event" that happened after Plaintiffs filed their respective operative complaints. As the Fourth Circuit has explained, leave to file a supplemental pleading "should be freely granted, and should be denied *only* where good reason exists . . . such as prejudice to the defendants." *Franks v. Ross*, 313 F.3d 184, 198 n.15 (4th Cir. 2002) (ellipsis in original) (emphasis added).

Otherwise, "[i]f the underlying facts or circumstances relied upon by a plaintiff may be a proper subject of relief," and the plaintiff moves to supplement or amend, the court should grant the motion so that the plaintiff has the "opportunity to test his claim on the merits." *Foman v. Davis*, 371 U.S. 178, 182 (1962).

There is no argument that the *Plaintiffs* have acted with bad faith or that the amendment would somehow prejudice the Defendants. To the contrary, the Plaintiffs have pursued their claim in good faith and it is the *Defendants* who have prejudiced the Plaintiffs by modifying—but not eliminating—the Photo ID Requirement after nearly two years of litigation (and less than a month before trial). Moreover, the General Assembly enacted changes to the Photo ID Requirement without any notice, and (as with the original enactment of H.B. 589) with only the barest of debate. And since amending the law, the State has undertaken inadequate measures to educate the public as to the new changes, while remaining vague as to how the modified requirement will be interpreted and implemented. Justice thus requires that, should the Court find the Plaintiffs' current challenges to be moot, the Court should at a minimum grant the Plaintiffs leave to amend their respective complaints.

CONCLUSION

For the foregoing reasons, the NAACP Plaintiffs respectfully request that this Court deny Defendants' motion to dismiss for lack of subject matter jurisdiction.

Dated: July 23, 2015

Respectfully submitted,

By: */s/ Daniel T. Donovan*

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2015, I electronically filed the foregoing **NAACP Plaintiffs' Opposition to Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction**, 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, including those counsel listed below.

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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