

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.

**UNOPPOSED MOTION FOR
ENTRY OF SECOND
SUPPLEMENTAL PROTECTIVE
ORDER**

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. 13-cv-861

The United States moves the Court to enter the accompanying Second Supplemental Protective Order. The proposed order sets forth procedures to facilitate the disclosure and comparison of certain information from databases and records maintained by Defendants and by the following federal agencies: the Department of Defense, the Department of State, and the Department of Veterans Affairs. These procedures are also necessary to provide additional protections governing use, access, storage, and destruction of the relevant federal data and data comparisons. All parties in these consolidated cases consent to this motion.

Expedited entry of this consent protective order is necessary for the conduct of discovery in this action. The United States, therefore, respectfully request that the accompanying Second Supplemental Protective Order be adopted by order of the Court.

Dated: September 22, 2014

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Respectfully submitted,

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CERTIFICATE OF SERVICE OF DISCOVERY

I hereby certify that on September 22, 2014, I electronically filed the foregoing **Unopposed Motion for Entry of Second Supplemental Protective Order**, 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/ Elizabeth M. Ryan
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