

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

BARBARA LEE, *et al.*,

Plaintiff,

v.

VIRGINIA STATE BOARD OF ELECTIONS, *et al.*,

Defendants.

Case No. 3:15CV357 HEH

**ANSWER TO AMENDED COMPLAINT**

1. Defendants admit that Barack Obama carried the Commonwealth of Virginia in the 2008 presidential election, and that he was the first Democrat to carry the Commonwealth in a presidential election since Lyndon B. Johnson in 1964. Defendants are without knowledge or information sufficient to form a belief about the truth of Plaintiffs' other allegations in paragraph 1, and therefore deny them.

2. Defendants admit that President Obama carried the Commonwealth of Virginia in the 2012 presidential election. Defendants are without knowledge or information sufficient to form a belief about the truth of Plaintiffs' other allegations in paragraph 2, and therefore deny them.

3. Defendants admit that the Virginia Legislature passed a law requiring voters to show photographic identification when voting. Plaintiffs' citation of Justice Posner's dissent in

*Frank v. Walker*, 773 F.3d 783, 788 (7th Cir. 2014) speaks for itself. Defendants deny the other allegations of paragraph 3.

4. The allegations of paragraph 4 are purely legal conclusions. To the extent that paragraph 4 contains factual allegations to which a response is required, such factual allegations are denied.

5. Defendants are without knowledge or information sufficient to form a belief about the truth of allegations related to Plaintiffs' intentions for bringing this lawsuit, and thus deny the allegations in paragraph 5. To the extent that paragraph 5 contains factual allegations to which a response is required, such factual allegations are denied.

#### **JURISDICTION AND VENUE**

6. The allegations of paragraph 6 are purely legal conclusions. To the extent that paragraph 6 contains factual allegations to which a response is required, such factual allegations are denied.

7. Defendants consent to venue in this judicial district. To the extent that paragraph 7 contains factual allegations to which a response is required, such factual allegations are denied.

#### **PARTIES**

8. Defendants deny that Plaintiff Barbara H. Lee has been or will be harmed by the enacted legislation as Plaintiffs describe in paragraph 8. In all other respects, Defendants are without knowledge or information sufficient to form a belief about the truth of Plaintiffs' other factual allegations in paragraph 8, and therefore deny them.

9. Defendants deny that Plaintiff Gonzalo J. Aida Brescia has been or will be harmed by the enacted legislation as described in paragraph 9. Defendants are without

knowledge or information sufficient to form a belief about the truth of Plaintiffs' other factual allegations in paragraph 9, and therefore deny them.

10. Defendants deny that Plaintiff Gonzalo J. Aida Brescia has been or will be harmed by the enacted legislation as described in paragraph 10. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 10, and therefore deny them.

11. Defendants deny that the Democratic Party of Virginia has been or will be harmed by the enacted legislation as those alleged harms are described in paragraph 11. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 11, and therefore deny them.

12. Defendants admit the allegations in paragraph 12.

13. Defendants admit the allegations of paragraph 13.

14. Defendants admit the allegations in paragraph 14.

15. Defendants admit that Edgardo Cortés is the Commissioner of the Virginia Department of Elections.

### **FACTUAL ALLEGATIONS**

16. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 16, and therefore deny them.

17. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of

discriminating against racial and ethnic minorities. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 17, and therefore deny them.

18. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. Plaintiffs' quotation from *The Oxford Handbook of Southern Politics* speaks for itself. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 18, and therefore deny them.

19. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. Plaintiffs' quotations from third-party sources in paragraph 19 speak for themselves. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 19, and therefore deny them.

20. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. Plaintiffs' quotation from *The Rise of Southern Republicans* in paragraph 20 speaks for itself. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 20, and therefore deny them.

21. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of

discriminating against racial and ethnic minorities. The legislation, the Congressional Record, and the case law cited in paragraph 21 all speak for themselves. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 21, and therefore deny them.

22. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. The case law cited in paragraph 22 speaks for itself. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 22, and therefore deny them.

23. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. Defendants lack knowledge or information as to the number of African-American members sitting in the Virginia House of Delegates as of July 1980. The Senate Report cited in paragraph 23 speaks for itself. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 23, and therefore deny them.

24. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 24, and therefore deny them.

25. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 25, and therefore deny them.

26. Plaintiffs' use of the terms "very few" and "major offices" are conclusory in nature and cannot be admitted or denied. Defendants admit that Virginia elected L. Douglas Wilder as Governor in 1990, but no African-American governor since has been elected.

Defendants admit that Virginia has never elected an African-American to the United States Senate. Defendants admit that Virginia has never elected an African-American attorney general. Defendants admit that Congressman Robert Scott is the only African-American to have been elected to represent Virginia in the United State House of Representatives since Reconstruction, but lack knowledge or information as to the reasons for Congressman Scott's election. Defendants admit that Virginia has never had a Latino governor, attorney general, or member of Congress. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 26, and therefore deny them.

27. Plaintiffs' allegations regarding racially-polarized voting are conclusory in nature and cannot be admitted or denied. *Collins v. City of Norfolk*, 883 F.2d 1232, 1240 (4th Cir. 1989) speaks for itself. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 27, and therefore deny them.

28. Plaintiffs' allegations regarding racially polarized voting are conclusory in nature and cannot be admitted or denied. Defendants are without knowledge or information sufficient to form a belief about the truth of the other allegations in paragraph 28, and therefore deny them.

29. The allegations of paragraph 29 are purely legal conclusions. To the extent that paragraph 29 contains factual allegations to which a response is required, such factual allegations are denied.

30. The allegations of paragraph 30 are purely legal conclusions. To the extent that paragraph 30 contains factual allegations to which a response is required, such factual allegations are denied.

31. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 31, and therefore deny them. Defendants deny that they

have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities.

32. Plaintiffs' citations of the U.S. Census Bureau's 2009-2013 American Community Survey 5-Year Estimates and the results of the 2000 Census in paragraph 32 speak for themselves. Defendants are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 32, and therefore deny them.

33. To the extent that Plaintiffs rely on the results of the 2010 federal census for the allegations in paragraph 33, those results speak for themselves. The United States Justice Department's allegations of "red-lining" similarly speak for themselves. Defendants are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in paragraph 33, and therefore deny them.

34. The allegations of paragraph 34 are purely legal conclusions. Plaintiffs' quotation from the 2008 report issued by the Virginia Department of Health speaks for itself. To the extent that paragraph 34 contains factual allegations to which a response is required, such factual allegations are denied.

35. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 35, and therefore deny them.

36. The allegations of racially polarized voting in paragraph 36 are substantially similar to those made in paragraph 36, and Defendants incorporate those responses herein. Defendants are generally informed that minority voters in Virginia favor Democratic presidential candidates and white voters favor Republican presidential candidates. The quote from Senator John C. Watkins regarding racially-polarized voting speaks for itself. Defendants are without

knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 36, and therefore deny them.

37. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 37, and therefore deny them.

38. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 38, and therefore deny them.

39. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 39, and therefore deny them.

40. Defendants admit the allegations set forth in paragraph 40.

41. Defendants admit that Republican Robert McDonnell was governor of Virginia after the 2011 elections. Defendants further admit that Republicans held a majority of seats in the Virginia House of Delegates at that time. Defendants further admit that Republicans were a majority of the Virginia Senate based on the tie-breaking vote held by Lieutenant Governor Bill Bolling, a Republican. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 41, and therefore deny them.

42. The allegations of this paragraph are substantially similar to those set forth in paragraph 2, and Defendants incorporate those responses herein. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 42, and therefore deny them.

43. The allegations of paragraph 43 are purely legal conclusions. To the extent that paragraph 43 contains factual allegations to which a response is required, such factual allegations are denied.



44. The allegations of paragraph 44 are purely legal conclusions. To the extent that paragraph 44 contains factual allegations to which a response is required, such factual allegations are denied.

45. Plaintiffs' citation to 2013 Va. Laws Ch. 725 (SB 1256) in paragraph 45 speaks for itself. Defendants admit that the bill passed the Virginia Senate, with Republicans in favor of the bill and Democrats voting in opposition to the bill. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 45, and therefore deny them.

46. The allegations of paragraph 46 are purely legal conclusions. To the extent that paragraph 46 contains factual allegations to which a response is required, such factual allegations are denied.

47. The allegations of paragraph 47 are purely legal conclusions. To the extent that paragraph 47 contains factual allegations to which a response is required, such factual allegations are denied.

48. The allegations of paragraph 48 are purely legal conclusions. To the extent that paragraph 48 contains factual allegations to which a response is required, such factual allegations are denied.

49. The allegations of paragraph 49 are purely legal conclusions. To the extent that paragraph 49 contains factual allegations to which a response is required, such factual allegations are denied.

50. The allegations of paragraph 50 are purely legal conclusions. To the extent that paragraph 50 contains factual allegations to which a response is required, such factual allegations are denied.

51. The allegations of paragraph 51 are either legal conclusions or Defendants do not have knowledge or information sufficient to form a belief about the truth of the allegations therein. To the extent that paragraph 51 contains factual allegations to which a response is required, such factual allegations are denied.

52. The allegations of paragraph 52 are either legal conclusions or Defendants do not have knowledge or information sufficient to form a belief about the truth of the allegations therein. To the extent that paragraph 52 contains factual allegations to which a response is required, such factual allegations are denied.

53. The allegations of paragraph 53 are purely legal conclusions. To the extent that paragraph 53 contains factual allegations to which a response is required, such factual allegations are denied.

54. The allegations of paragraph 54 are either legal conclusions or Defendants do not have knowledge or information sufficient to form a belief about the truth of the allegations therein. The documents cited in paragraph 54 speak for themselves. To the extent that paragraph 54 contains factual allegations to which a response is required, such factual allegations are denied.

55. Defendants deny that the challenged Virginia statute unreasonably burdens anyone's right to vote. Defendants admit that registered voters who wish to vote must have identification, but deny that acquiring the identification required by the statute is an unreasonable or arbitrary burden. Defendants deny that the challenged statute disenfranchises any voter.

56. Defendants deny that Virginia's voter identification law has suppressed or will suppress turnout. The Government Accountability Office report and the statements attributed to

M.V. Hood III speak for themselves, but Defendants generally deny that voter identification laws of other states are reflective of Virginia's voter identification law.

57. Defendants deny that Virginia's voter identification law has suppressed or will suppress turnout. The documents cited in paragraph 57 speak for themselves. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 57, and therefore deny them.

58. Defendants admit that approximately 700 ballots were provisionally cast because the voter failed to present appropriate identification. The amount of votes that may or may not be rejected during the 2016 general election is a matter of pure speculation, and cannot be admitted or denied. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 58, and therefore deny them.

59. Defendants deny the allegations set forth in paragraph 59.

60. Defendants deny the allegations set forth in paragraph 60.

61. The documents cited in paragraph 61 speak for themselves. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 61, and therefore deny them.

62. The Brennan Center for Justice study cited in paragraph 62 speaks for itself. Defendants do not have information or knowledge sufficient to form a belief about the truth of the allegations in paragraph 62, and therefore deny them.

63. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 63, and therefore deny them.

64. Defendants deny the allegations set forth in paragraph 64.

65. Defendants deny the allegations set forth in paragraph 65.

66. Defendants deny the allegations set forth in paragraph 66.

67. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 67, and therefore deny them.

68. Defendants admit that the average age of applicants for Virginia's free voter photo IDs was 64.

69. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 69, and therefore deny them.

70. Defendants deny that obtaining identification under the statute is burdensome on any individual. Defendants otherwise are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 70, and therefore deny them.

71. Defendants deny the allegations set forth in paragraph 71.

72. Defendants deny the allegations set forth in paragraph 72.

73. Defendants deny that preventing voter-impersonation fraud is not a rational basis for the Virginia Legislature to act. Plaintiffs' citations to Judge Posner's dissenting opinion in the *Frank* case speak for themselves. Defendants otherwise are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 73, and therefore deny them.

74. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 74, and therefore deny them.

75. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 75, and therefore deny them.

76. Defendants deny that the challenged statute has not or will not materially increase confidence in the election process. Defendants otherwise are without knowledge or information

sufficient to form a belief about the truth of the allegations in paragraph 76, and therefore deny them.

77. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 77, and therefore deny them. To the extent that paragraph 77 contains factual allegations to which a response is required, such factual allegations are denied.

78. Defendants deny the factual allegations set forth in paragraph 78. The GAO report cited in paragraph 78 speaks for itself.

79. The allegations of paragraph 79 are purely legal conclusions. To the extent that paragraph 79 contains factual allegations to which a response is required, such factual allegations are denied. Judge Posner's dissenting opinion in *Frank* speaks for itself.

80. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. The study Plaintiffs cite in paragraph 80 speaks for itself. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 80, and therefore deny them.

81. Defendants deny that they have enacted any policy to discriminate against racial and ethnic minorities, and deny that the enacted legislation was intended or has the effect of discriminating against racial and ethnic minorities. The study Plaintiffs cite in paragraph 81 speaks for itself. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 81, and therefore deny them.

82. Defendants deny the allegations in paragraph 82.

83. Defendants admit that from time to time, and for a myriad of reasons, voters have experienced longer than normal wait times to vote. Defendants do not have knowledge or information regarding the statements attributed to Mr. Guiffre or the Presidential Commission on Election Administration. Defendants deny that Virginia generally has a “problem” with long wait times to vote, and notes that whether “long lines are likely to recur in the 2016 general election” is a matter of pure speculation. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 83, and therefore deny them.

84. Defendants deny the allegations in paragraph 84, with the exception that it does not have information or knowledge regarding the conclusion of the Presidential Commission on Election Administration that voters should not have to wait longer than 30 minutes to vote. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 84, and therefore deny them.

85. Defendants deny the allegations in paragraph 85.

86. Defendants deny the allegations in paragraph 86, with the exception that it does not have information or knowledge of the statements attributed to Donald Palmer. Defendants also deny that to the extent wait times are present at individual polls, those wait times are a result of the challenged statute, or any other uniform policy adopted or implemented by Defendants. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 86, and therefore deny them.

87. Defendants deny the allegations in paragraph 87.

88. Defendants deny the allegations in paragraph 88.

89. Defendants deny the allegations in paragraph 89.

90. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 90, and therefore deny them.

91. Defendants deny the allegations in paragraph 91.

92. The provisions of the Virginia Constitution speak for themselves. Defendants do not have information or knowledge regarding other states' rules on the voting status of felons. Defendants are without knowledge or information sufficient to form a belief about the truth of any other allegations in paragraph 92, and therefore deny them.

93. Defendants deny the allegations in paragraph 93.

94. Defendants deny the allegations in paragraph 94.

95. Defendants admit that the Virginia Constitution does not permit convicted felons to vote. Defendants otherwise are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 95, and therefore deny them.

96. Defendants deny the allegations in paragraph 96.

97. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 97, and therefore deny them.

98. Defendants are without knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 98, and therefore deny them.

99. Defendants deny the allegations of paragraph 99.

## **CAUSES OF ACTION**

### **COUNT 1**

#### **(Violations of Section 2 of the Voting Rights Act)**

100. Defendants hereby reallege and reincorporate by reference all prior paragraphs of this Answer.

101. The allegations of paragraph 101 are purely legal conclusions. To the extent that paragraph 101 contains factual allegations to which a response is required, such factual allegations are denied.

102. Defendants deny the allegations in paragraph 102.

103. Defendants deny the allegations in paragraph 103.

104. Defendants deny the allegations in paragraph 104.

105. Defendants deny the allegations in paragraph 105.

106. Defendants deny the allegations in paragraph 106.

107. Defendants deny the allegations in paragraph 107.

## **COUNT II**

### **(Undue Burdens on the Right to Vote and Disparate Treatment of Individuals Without a Rational Basis)**

108. Defendants hereby reallege and reincorporate by reference all prior paragraphs of this Answer.

109. The allegations of paragraph 109 are purely legal conclusions. To the extent that paragraph 109 contains factual allegations to which a response is required, such factual allegations are denied.

110. Defendants deny the allegations in paragraph 110.

111. Defendants deny the allegations in paragraph 111.

112. Defendants deny the allegations in paragraph 112.

113. Defendants deny the allegations in paragraph 113.



**COUNT III**

**(Partisan Fencing)**

114. Defendants hereby reallege and reincorporate by reference all prior paragraphs of this Answer.

115. The allegations of paragraph 115 are purely legal conclusions. To the extent that paragraph 115 contains factual allegations to which a response is required, such factual allegations are denied.

**COUNT IV**

**(Intentional Discrimination on the Basis of Race)**

116. Defendants hereby reallege and reincorporate by reference all prior paragraphs of this Answer.

117. The allegations of paragraph 117 are purely legal conclusions. To the extent that paragraph 117 contains factual allegations to which a response is required, such factual allegations are denied.

118. Defendants deny the allegations in paragraph 118.

119. Defendants deny the allegations in paragraph 119.

120. Defendants deny the allegations in paragraph 120.

121. Defendants deny the allegations in paragraph 121.

**COUNT V**

**(Intentional Discrimination on the Basis of Age)**

122. Defendants hereby reallege and reincorporate by reference all prior paragraphs of this Answer.

123. The allegations of paragraph 123 are purely legal conclusions. To the extent that paragraph 123 contains factual allegations to which a response is required, such factual allegations are denied.

124. Defendants deny the allegations in paragraph 124.

125. Defendants deny the allegations in paragraph 125.

126. Defendants deny the allegations in paragraph 126.

**PRAYER FOR RELIEF**

127. Defendants deny that Plaintiffs are entitled to any of the relief described in their Prayer for Relief.

**AFFIRMATIVE DEFENSES**

1. This Court lacks jurisdiction over the subject matter in the Amended Complaint because plaintiffs lack standing.

2. The Amended Complaint fails to state a claim upon which relief may be granted.

3. Plaintiffs' claims should be dismissed under the ripeness doctrine.

4. Plaintiffs have failed to join one or more necessary parties.

5. Plaintiffs ask this Court for relief that is beyond the power of the federal judiciary to grant.

**WHEREFORE**, Defendants request that:

1. Plaintiffs' Amended Complaint be dismissed with prejudice and that judgment be entered for Defendants on all claims;

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2. Defendants be awarded such other and further relief as the Court may deem just and proper, including their attorneys' fees and costs.

DATED: August 28, 2015

Respectfully submitted,

*/s/ Dana J. Finberg*  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served via the Court's CM/ECF system  
on August 28, 2015, to the following:

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## General Information

<b>Court</b>	United States District Court for the Eastern District of Virginia; United States District Court for the Eastern District of Virginia
<b>Federal Nature of Suit</b>	Civil Rights - Voting[441]
<b>Docket Number</b>	3:15-cv-00357