

**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.

**PLAINTIFFS' MOTION TO
EXPEDITE**

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

PLAINTIFFS' MOTION TO EXPEDITE

Plaintiffs jointly move to expedite resolution of (1) Plaintiffs' Partial Objection to the Magistrate Judge's Order on Legislative Privilege, which Plaintiffs have filed concurrently with this request to expedite, and (2) any objection that Defendants may file to the Magistrate Judge's November 20, 2014 order, if Defendants file such an objection. Given upcoming discovery deadlines, including those for expert reports, prompt resolution of remaining disputes regarding the production of legislative documents is critical. In light of the upcoming holidays, Plaintiffs respectfully request that the Court adopt a briefing schedule under which briefing on any objection to the Magistrate Judge's November 20, 2014 order would be completed by Friday December 19, 2014.

On December 4, 2014, during a meet and confer call with all parties, Plaintiffs notified Defendants of their intention to file a partial objection to the November 20 order and their intention to file this motion for expedited briefing and resolution. Defendants indicated they were amenable to an expedited briefing schedule for objections to the November 20 order; however, they did not state a position on Plaintiffs' proposal to conclude all briefing by December 19.

Dated: December 4, 2014

Respectfully submitted,

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
Telephone: (202) 728-9557
E-mail:
phair@advancementproject.org

Irving Joyner (N.C. State Bar # 7830)
P.O. Box 374
Cary, NC 27512
Telephone: (919) 319-8353
E-mail: ijoyner@nccu.edu

By: /s/ Adam Stein

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

/s/ Daniel T. Donovan

Thomas D. Yannucci
Daniel T. Donovan
Susan M. Davies
Bridget K. O'Connor
K. Winn Allen
Kimberly D. Rancour
Jodi Wu
KIRKLAND & ELLIS LLP
655 Fifteenth St., N.W.
Washington, DC 20005
Telephone: (202) 879-5000
E-mail: tyannucci@kirkland.com

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

Laughlin McDonald*
ACLU Voting Rights Project
2700 International Tower
229 Peachtree Street, NE
Atlanta, GA 30303
(404) 500-1235
lmcdonald@aclu.org
* appearing pursuant to Local Rule
83.1(d)

By: /s/ Allison J. Riggs

Anita S. Earls (State Bar # 15597)
Allison J. Riggs (State Bar # 40028)
Clare R. Barnett (State Bar #42678)
Southern Coalition for Social Justice
1415 Highway 54, Suite 101
Durham, NC 27707
Telephone: 919-323-3380 ext. 115
Facsimile: 919-323-3942
E-mail: anita@southerncoalition.org

Christopher Brook (State Bar
#33838) ACLU of North Carolina
Legal Foundation
P.O. Box 28004
Raleigh, NC 27611-8004
Telephone: 919-834-3466
Facsimile: 866-511-1344
E-mail: cbrook@acluofnc.org

Dale Ho*
Julie A. Ebenstein*
ACLU Voting Rights Project
125 Broad Street
New York, NY 10004
(212) 549-2693
dale.ho@aclu.org
**appearing pursuant to Local Rule
83.1(d)*

Attorneys for Plaintiffs in League of Women Voters of North Carolina, et al. v. North Carolina, et al.

/s/ Gill P. Beck
GILL P. BECK
NCSB No. 13175
Special Assistant United States Attorney
100 Otis Street
Asheville, NC 28801
Telephone: (828) 259-0645

/s/ Elizabeth M. Ryan
T. CHRISTIAN HERREN, JR.
JOHN A. RUSS IV
CATHERINE MEZA
DAVID G. COOPER
SPENCER R. FISHER
JENIGH J. GARRETT
ELIZABETH M. RYAN
Attorneys, Voting Section
Civil Rights Division
United States Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Telephone: (800) 253-3931
Email: elizabeth.ryan@usdoj.gov

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

CERTIFICATE OF SERVICE

I hereby certify that on December 4, 2014, I electronically filed the foregoing **Plaintiffs' Motion to Expedite**, 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
ELIZABETH M. RYAN
U.S. Department of Justice
Civil Rights Division - Voting Section
950 Pennsylvania Avenue, N.W.
Washington, DC 20530
Phone: (800) 253-3931
Email: elizabeth.ryan@usdoj.gov