UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,	§	
Plaintiffs,	§ §	
v.	§	CIVIL ACTION NO. 2:13-CV-00193
	§	
GREG ABBOTT, et al.,	§	
	§	
Defendants.	§	

DEFENDANTS' ADVISORY REGARDING REMEDIES BRIEFING

Defendants file this advisory to correct statements made in their recent briefing on remedies. South Carolina's photo-ID voting law with a reasonable-impediment-declaration procedure was precleared under Voting Rights Act § 5 in 2012 by the United States District Court for the District of Columbia—not by the Department of Justice, as erroneously stated by defendants (D.E. 1049 at 8, 18; D.E. 1047 at 11). South Carolina v. United States, 898 F. Supp. 2d 30, 35, 48 (D.D.C. 2012).

North Carolina's photo-ID voting law with a reasonable-impediment-declaration procedure was cited in the same parenthetical as South Carolina's law. D.E. 1049 at 8; D.E. 1047 at 11; D.E. 1035 at 7. The North Carolina law was not precleared by the Department of Justice, as the preclearance regime did not cover any States by 2015. See Shelby County v. Holder, 133 S. Ct. 2612, 2631 (2013). Rather, as defendants noted, the reasonable-impediment-declaration procedure of North Carolina's law was deemed "[e]specially significant" by Judge Higginson's concurring opinion in Veasey v. Abbott. 830 F.3d 216, 279 (5th Cir. 2016) (en banc) (Higginson, J., concurring).

Date: July 12, 2017 Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2017, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Angela V. Colmenero Angela V. Colmenero