

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SANDRA LITTLE COVINGTON, *et al.*,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, *et al.*,

Defendants.

No. 1:15-cv-00399

**MOTION OF DEMOCRACY NORTH CAROLINA AND LEAGUE OF WOMEN
VOTERS OF NORTH CAROLINA FOR LEAVE TO FILE
AMICI CURIAE BRIEF IN OPPOSITION TO DEFENDANTS' REDISTRICTING
PLAN AND IN SUPPORT OF PLAINTIFFS**

Democracy North Carolina (“Democracy NC”) and the League of Women Voters of North Carolina (“LWV NC”) respectfully move this Court for leave to file the attached *Amici Curiae* Brief of Democracy North Carolina and League of Women Voters of North Carolina in Opposition to Defendants’ Redistricting Plan and In Support of Plaintiffs.

Democracy NC conducts research, organizing, public education, and advocacy in order to increase voter participation—put simply, it aims to maximize the number of citizens at the polls, the number of eligible ballots counted, and the effect and importance of each vote. The organization has supporters throughout North Carolina who are registered voters and who vote in North Carolina elections. Democracy NC also researches and catalogs issues that voters have with the voting process—including issues that have arisen in connection with redistricting—and conducts a Redistricting Reform campaign

through which it seeks to educate North Carolina voters about the importance of fair maps, to engage voters in the redistricting process, and to promote policy change to put an end to partisan and racial gerrymandering.

League of Women Voters of NC is a nonpartisan, community-based organization formed in 1920 after the enactment of the Nineteenth Amendment granting women the right to vote. Currently, LWV NC has 17 local leagues across the state with members who are registered and regular voters. The LWV NC is dedicated to encouraging its members and the people of North Carolina to exercise their right to vote as protected by the Constitution and the Voting Rights Act of 1965. The mission of LWV NC is to promote political responsibility through informed and active participation in government. The LWV NC strives to promote citizen education and make democracy work by, among other things, removing unnecessary barriers to full participation in the electoral process—including partisan and racial gerrymandering.

Proposed *amici* are also plaintiffs in the consolidated state court case, *Dickson v. Rucho*, now before the North Carolina Supreme Court on remand, which challenges many of the 2011 districts at issue here as unconstitutionally based on race. (11 CVS 16896, consolidated with *NC NAACP v. State of North Carolina* (11 CVS 16940), 766 S.E.2d 238 (N.C. 2014), *vacated*, 135 S. Ct. 1843 (2015), *remanded to* 781 S.E.2d 404 (N.C. 2015); *vacated and remanded*, 198 L. Ed. 2d 252 (U.S. 2017)).

As stated in the accompanying Memorandum of Law in Support of the Motion for Leave to File *Amici Curiae* Brief in Opposition to Defendants' Redistricting Plan and In

Support of Plaintiffs, Democracy NC and LWV NC offer the Court an important perspective on the recent public hearings about redistricting that Defendants conducted and that Defendants claimed were important.

For these reasons, which are fully stated in the accompanying Memorandum of Law, Democracy NC and LWV NC respectfully ask that this Court grant this motion to file the attached proposed *amici curiae* brief.

Dated: September 15, 2017

Respectfully submitted,

/s/ Mark R. Sigmon

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CERTIFICATE OF SERVICE

I certify that on this day, I filed the foregoing **Motion of Democracy North Carolina and League of Women Voters of North Carolina for Leave to File *Amici Curiae* Brief in Opposition to Defendants' Redistricting Plan and In Support of Plaintiffs** with the clerk's office via the CM/ECF system, which will send notification of filing to the following counsel of record:

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