

**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-TDS-JEP

**MOTION OF THE NC NAACP FOR LEAVE TO FILE  
AMICUS CURIAE BRIEF IN SUPPORT OF PLAINTIFFS' OBJECTIONS  
TO THE ENACTED REMEDIAL REDISTRICTING PLANS**

The North Carolina State Conference of the National Association for the Advancement of Colored People (“NC NAACP”) respectfully moves the Court for leave to file the attached Brief of Amicus Curiae of the NC NAACP in Support of Plaintiffs’ Objections to the Enacted Remedial Redistricting Plans.

The NC NAACP is a grassroots-based, non-profit, civil rights organization with the mission of ensuring the rights of people to political, educational, social, and economic equality, and eliminating racial discrimination. The NC NAACP has worked for decades to protect voting rights, promote voter participation in North Carolina, and engage a multi-racial coalition, or “fusion” electorate in North Carolina that reaches across racial lines and is based not on the color of voters’ skin, but on the voters’ common interests in the important issue of the day and on a shared commitment to racial justice.

The NC NAACP is also a plaintiff in the consolidated state court case, *Dickson v. Rucho* (11 CVS 16896) and *NC NAACP v. State of North Carolina* (11 CVS 16940), 766 S.E.2d 238 (N.C. 2014), *vacated*, 135 S. Ct. 1843 (2015) (mem.), *remanded to* 781 S.E.2d 404 (N.C. 2015); *vacated and remanded*, 198 L. Ed. 2d 252 (U.S. 2017) (mem.), which raises parallel claims, both federal and state, challenging as unconstitutional various districts in the state's 2011 legislative and congressional redistricting plans.

As stated in the accompanying Memorandum of Law, the NC NAACP offers the Court an important perspective on the Legislative Defendants' flawed treatment of race in the redistricting process. For these reasons and the reasons stated in the accompanying Memorandum of Law, the NC NAACP respectfully ask that this Court grant its motion to file the attached proposed amicus curiae brief.

Dated: September 15, 2017

Respectfully submitted,

/s/ Irving Joyner

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## **CERTIFICATE OF SERVICE**

I certify that on this day, I filed the foregoing **Motion for Leave to File Amicus Curiae Brief** 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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This the 15th day of September, 2017.

/s/

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