

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

SYLVESTER ALLEN, JR., *et al.*,

Plaintiffs,

v.

CITY OF GRAHAM, *et al.*,

Defendants.

1:20-cv-0997-CCE-LPA

STIPULATION OF DISMISSAL

All parties to the above-captioned action (the “*Allen* Action”), acting through counsel and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby stipulate, in consideration of a negotiated settlement executed between them, to the Dismissal with Prejudice of the *Allen* Action, with each party to bear its own attorneys’ fees and costs. For the avoidance of doubt, this Stipulation of Dismissal is in the *Allen* Action only and does not impact the separate action captioned *Drumwright, et al. v. Cole, et al.*, 1:20-CV-00998, which was consolidated with the *Allen* Action.

Dated: June 25, 2021

Respectfully submitted,

/s/ Geraldine Sumter

Geraldine Sumter

North Carolina Bar No. 11107

gsumter@fergusonsumter.com

Ferguson Chambers & Sumter, P.A.

309 East Morehead Street, Suite 110

Charlotte, NC 28202

Tel.: (704) 375-8461

Leah Aden*
laden@naacpldf.org
Natasha Merle*
nmerle@naacpldf.org
Anuja D. Thatte*
athatte@naacpldf.org
Ashok Chandran*
achandran@naacpldf.org
NAACP Legal Defense &
Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10031
Tel.: (212) 965-2200

C. William Phillips*
cphillips@cov.com
Covington & Burling LLP
620 8th Avenue
New York, NY 10018
Tel.: (212) 841-1081

Marianne Spencer*
mspencer@cov.com
Covington & Burling LLP
850 Tenth Street, N.W.
Washington, DC 20001
Tel.: (202) 662-6000

Morgan Lewis*
melewis@cov.com
Covington & Burling LLP
415 Mission Street
San Francisco, CA 94105
Tel.: (415) 591-6000

Attorneys for Allen Plaintiffs

*Notice of Special Appearance Filed

/s/ Anthony Biller
Anthony Biller
North Carolina Bar No. 24117
ajbiller@envisage.law
Envisage Law
2601 Oberlin Rd., Suite 100
Raleigh, North Carolina 27608
Tel.: (919) 755-1317

Attorney for City of Graham Defendants

/s/ William L. Hill
William L. Hill
North Carolina Bar No. 21095
whill@frazierlawnc.com
Frazier Hill & Fury, RLLP
POD 1559
Greensboro, NC 27402
Tel.: (336) 378-7787

Attorney for Alamance County Defendants

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this day filed the foregoing *Stipulation of Dismissal* with the Clerk of Court using the CM/ECF system, which will send electronic notification of such filing to the following attorneys of record in the consolidated actions:

Anuja D. Thatte, athatte@naacpldf.org
Ashok Chandran, achandran@naacpldf.org
Clarence W. Phillips, cphillips@cov.com
Marianne Spencer, mspencer@cov.com
Leah Aden, laden@naacpldf.org
Morgan Lewis, mlewis@cov.com
Natasha Merle, nmerle@naacpldf.org
Attorneys for Allen Plaintiffs

Anthony Biller, ajbiller@envisage.law
Adam P. Banks, abanks@envisage.law
James R. Lawrence, III, jlawrence@envisage.law
Attorneys for City of Graham Defendants

William L. Hill, whill@frazierlawnc.com
Clyde B. Albright, clyde.albright@alamance-nc.com
Patrick Houghton Flanagan, phf@cshlaw.com
Paul Gerard Gessner, pgessner@cshlaw.com
Attorneys for Alamance County Defendants

Elizabeth Haddix, ehaddix@lawyerscommittee.org
Daniel K. Siegel, dsiegel@acluofnc.org
Jaclyn A. Maffetore, jmaffetore@acluofnc.org
Kristi L. Graunke, kgraunke@acluofnc.org
Mark Dorosin, mdorosin@lawyerscommittee.org
Jennifer N. Nwachukwu, jnwachukwu@lawyerscommittee.org
Christopher A. Knight, cknight@mayerbrown.com
Geoffrey M. Pipoly, gpipoly@mayerbrown.com
Attorneys for Plaintiffs in Drumwright, et al. v. Cole, et al., 1:20-CV-00998

Dated: June 25, 2021

/s/ Geraldine Sumter
Geraldine Sumter
North Carolina Bar No. 11107
gsumter@fergusonsumter.com

Attorney for Allen Plaintiffs