

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**  
(Northern Division)

NATIONAL FEDERATION  
OF THE BLIND, INC., *et al.*,

Plaintiffs,

v.

Civil Action No. 14-1631-RDB

LINDA H. LAMONE, *et al.*,

Defendants.

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**MOTION FOR PERMANENT INJUNCTION**

Plaintiffs the National Federation of the Blind, Inc. (“NFB”), Kenneth Capone, Melissa Riccobono, and Janice Toothman (collectively “Plaintiffs”), by their undersigned counsel, pursuant to Fed. R. Civ. P. 65 and 42 U.S.C. § 12101 (b)(1), move the Court to issue a permanent injunction against Defendants Linda H. Lamone, in her official capacity as State Administrator of the Maryland State Board of Elections (“the Board”), Bobbie S. Mack, in her official capacity as Chairman of the Board, David J. McManus, Jr., in his official capacity as Vice Chairman of the Board, and Patrick J. Hogan, Janet S. Owens, and Charles E. Thomann, in their official capacities as members of the Board, ordering the Board to comply with Title II of the Americans with Disabilities Act (“ADA”), 42 U.S.C. §§ 12101-12213, and Section 504 of the Rehabilitation Act of 1973 (“Section 504”), 29 U.S.C. § 794, by requiring the Board to make the online-ballot-marking tool available for all future elections to those voters with disabilities who would benefit from access to the online-ballot-marking tool. The grounds for this motion

are set forth in the attached Hearing Brief and Memorandum in Support of Plaintiffs' Motion for Permanent Injunction and accompanying exhibits.

WHEREFORE, Plaintiffs request that their Motion be granted and that the Court issue a permanent injunction against Defendants.

Respectfully submitted,

/s/

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