## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MAINE BANGOR DIVISION

THE UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	CIVIL ACTION NO. 06-86-B-W
STATE OF MAINE, and MATTHEW DUNLAP, Secretary of State, in his official capacity.	)	
Defendants.	)	
	)	

## JOINT MOTION REQUESTING ENTRY OF PROPOSED SUPPLEMENTAL CONSENT DECREE, JUDGMENT, AND ORDER

The United States and the State of Maine and Secretary of State Matthew Dunlap hereby jointly request the Court to approve a supplemental Consent Decree substituting for the terms of the original Consent Decree agreed to by the parties on July 28, 2006, and approved and entered by this Court on August 1, 2006, and the Amended Consent Decree agreed to by the parties on October 23, 2006, and approved and entered by this Court on October 26, 2006. The requested supplemental Consent Decree adjusts the schedule for full implementation of the central voter registration system ("CVR"), as originally set out in Attachments A and A-1, which were entered by this Court on August 1, 2006 and October 26, 2006, respectively.

In the view of both parties, the supplemental Consent Decree being requested will aid in ensuring the complete implementation of the CVR, which will assist the State in complying with the database requirements of Section 303(a) of the Help America Vote

Act of 2002, 42 U.S.C. § 15483(a), and with the list maintenance requirements of Section 8 of the National Voter Registration Act, 42 U.S.C. § 1973gg-6.

Dated: March 22, 2007 Respectfully submitted,

/s/ Paula Silsby
PAULA SILSBY
United States Attorney

/s/ Robert Popper
ROBERT POPPER
Special Litigation Counsel
SEAN W. O'DONNELL
HILLARY E. MAKI
Trial Attorneys
United States Department of Justice
Civil Rights Division, Voting Section
950 Pennsylvania Avenue, N.W.
Room 7254-NWB
Washington, D.C. 20530

Attorneys for the United States of America

/s/ Phyllis Gardiner
PHYLLIS GARDINER
Assistant Attorney General
6 State House Station
Augusta, Maine 04333-0006

Counsel for Defendants