

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

ESSEX COUNTY, VIRGINIA,)	
)	
Plaintiff,)	
)	
v.)	
)	
ALBERTO R. GONZALES,)	
Attorney General of the)	C. A. No. 1:06-cv-1631
United States of America,)	
WAN J. KIM,)	Three-judge court
Assistant Attorney General,)	(RBW, MBG, RMU)
Civil Rights Division, United States)	
Department of Justice, Washington, DC,)	
)	
Defendants.)	
_____)	

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT AND DECREE

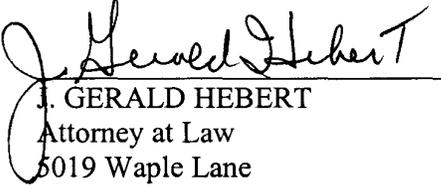
The plaintiff Essex County, Virginia, and the Defendants Alberto R. Gonzales and Wan J. Kim, through counsel, respectfully move this three-judge Court for entry of the attached Consent Judgment and Decree.

The enclosed Consent Judgment and Decree, which must be signed and approved by this three-judge Court, see 42 U.S.C. §1973b, is very similar to those that have been entered by three-judge courts in other declaratory judgment actions brought under Section 4 of the Voting Rights Act, as amended. See, e.g., *Botetourt County, VA v. Gonzales*, C.A. No. 1:06-cv-1052 (D.D.C., August 28, 2006); *City of Salem, VA v. Gonzales*, C.A. No. 1:06-cv-977 (D.D.C., July 27, 2006); *Augusta County, VA v. Gonzales*, C.A. No. 05-1885 (D.D.C., November 30, 2005); *Greene County, VA v. Ashcroft*, C.A. No. 03-1887 (D.D.C., January 19, 2004); *Roanoke County, VA v. Reno*, C.A. No. 00-1949 (D.D.C., January 24, 2001); *City of Winchester, VA v. Ashcroft*, C.A.

No. 00-3073 (D.D.C., May 31, 2001); and *City of Fairfax, v. Reno*, C.A. No. 97-2212 (D.D.C., October 21, 1997). As in those actions, this motion is based on the Stipulation of Facts which is being filed simultaneously herewith.

WHEREFORE, Plaintiff and Defendants respectfully pray that this joint motion be granted.

For the Plaintiff Essex County, Virginia


J. GERALD HEBERT
Attorney at Law
5019 Waple Lane
Alexandria, Va. 22304
(703) 628-4673 (O)
DC Bar No. 447676

**For the Defendants Alberto R. Gonzales
and Wan J. Kim:**

JEFFREY A. TAYLOR
United States Attorney


JOHN TANNER
CHRISTY McCORMICK
SONYA L. SACKS
Attorneys, Voting Section
Civil Rights Division
United States Department of Justice
Room 7254 - NWB
950 Pennsylvania Ave., N.W.
Washington, DC 20530
(202) 514-2386