

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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ANNE POPE, et al.,	:	
	:	
Plaintiffs,	:	No. 11-CV-0736 (LEK) (DRH)
v.	:	
	:	
COUNTY OF ALBANY, et al.,	:	
	:	
Defendants.	:	
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NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Declarations of Paul DerOhannesian II, Kathy Sheehan, Aaron Mair, Wanda Willingham, Lucille McKnight, Anne Pope, Sam Coleman, Janis Gonzalez, Bill Cooper, Baodong Liu, Alice Green, Carlos Gonzalez, Ingrid Allard, Noelene Smith, Joe Gomez, Barry Walston, and Corey Ellis, with annexed exhibits, and the accompanying memorandum of law, dated July 15, 2011, and all prior papers and proceedings had herein, plaintiffs Anne Pope, Wanda Willingham, and Janis Gonzalez (collectively, the “Plaintiffs”) will move this Court, on August 3, 2011, at 10:00 a.m., before the Honorable Lawrence E. Kahn, in Courtroom 1, fourth floor, James T. Foley U.S. Courthouse, 445 Broadway, Albany, New York, for an order granting Plaintiffs a preliminary injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure, preliminarily enjoining and restraining the defendants County of Albany and Albany County Board of Elections (collectively, the “Defendants”), their officers, agents, attorneys, employees and successors in office as well as all persons in active concert with them from conducting the petition process, gathering signatures for elections, holding and conducting any further primary or general elections, or implementing or certifying elections in the districts under the current scheme

implemented in 2004 or those created by Local Law C for any term of office commencing January 1, 2012, and granting such other and further relief as the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's order dated July 1, 2011, opposition papers, if any, to Plaintiffs' motion, shall be served on undersigned counsel on or before July 29, 2011.

Dated: New York, New York
July 15, 2011

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