UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK
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ANNE POPE, et al.,

Plaintiffs,

-against-

No. 11-cv-736 (LEK/CFH)

COUNTY OF ALBANY, et al.,

Defendants.

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## PLAINTIFFS' NOTICE OF MOTION FOR A PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that, upon the testimony at trial to date, exhibits admitted into evidence, Plaintiffs' Pretrial Submissions (Dkts. 321, 321-1, 322, 322-2, 323, 324, 334, 334-1), and all prior papers and proceedings had herein, plaintiffs Anne Pope, Wanda Willingham, Geraldine Bell, Samuel Coleman, Lee Pinckney, Elaine Frazier, and Vicente Alfonso (the "Plaintiffs") will move this Court, on February 6, 2015, at 9:30 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, preliminary enjoining and restraining the defendants County of Albany and Albany County Board of Elections (the "Defendants"), their officers, agents, attorneys, employees and successors in office as well as persons in active concert with them from (1) conducting the petition process, gathering signatures for elections, holding and conducting any further primary or general elections, or implementing or certifying elections for the Albany County Legislature in any district; (2) holding a vote of the Albany County Legislature regarding the potential change to the size, number, and/or composition of the Albany County Legislature, conducting the voter referendum process necessary in order to

change the size, number, and/or composition of the Albany County Legislature, or otherwise taking any steps that would change the size, number, and/or composition of the Albany County Legislature such that it would take effect prior to the 2020 United States Census, and; (3) granting such other and further relief as the Court deems appropriate.

Dated: New York, New York

December 22, 2014

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

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