NORTHERN DISTRICT OF NEW YORK	
ANNE POPE, et al.,	: :
Plaintiffs,	: :
-against-	: No. 11-cv-736 (LEK/CFH
COUNTY OF ALBANY, et al.,	: :
Defendants	:

UNITED STATES DISTRICT COURT

PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR JUDGMENT AS A MATTER OF LAW

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Judgment as a Matter of Law, plaintiffs Anne Pope, Wanda Willingham, Geraldine Bell, Samuel Coleman, Lee Pinckney, Elaine Frazier, and Vicente Alfonso (the "Plaintiffs") move this Court, on January 22nd, 2015, for judgment as a matter of law pursuant to Rule 52(c) of the Federal Rules of Civil Procedure.

Plaintiffs bring this motion on the grounds that Plaintiffs carried their burden of proof on each of the *Gingles* preconditions at trial, and Defendants offered virtually no rebuttal evidence. Trial proceedings have now closed and the parties have been fully heard on all issues. *See* Fed. R. Civ. P. 52(c); Dkt. 403. Plaintiffs' Motion for Judgment as a Matter of Law renews Plaintiffs' motion for a directed verdict regarding the political cohesion of the County's Black population alone, originally made on November 6, 2014, and moves this Court for a directed verdict finding in favor of Plaintiffs on the first, second, and third *Gingles* preconditions with respect to their Black-only claim and combined Black and Hispanic claim, as well as finding in favor regarding the totality of the circumstances.

Plaintiffs respectfully request that this Court grant the Motion for Judgment as a Matter of Law and are available for oral argument subject to the Court's preference.

Dated this 22nd day of January, 2015

Respectfully submitted,

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