

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF COLUMBIA

WASHINGTON COUNTY, VIRGINIA,	)	
a political subdivision of the	)	
Commonwealth of Virginia,	)	
County Administration Building	)	
205 Academy Drive	)	
Abingdon, Virginia, 24210	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
MICHAEL B. MUKASEY	)	
Attorney General of the	)	Civil Action No. 1:08-cv-01112
United States of America,	)	RMU-ESH-JRB
GRACE CHUNG BECKER,	)	(three-judge court)
Acting Assistant Attorney General,	)	
Civil Rights Division,	)	
United States Department of Justice,	)	
Washington, DC, 20530	)	
	)	
Defendants.	)	
_____	)	

**JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT AND DECREE**

The Plaintiff Washington County, Virginia, and the Defendants Michael B. Mukasey and Grace Chung Becker, through counsel, respectfully move this three-judge Court for entry of the attached Consent Judgment and Decree. As grounds for this motion, the parties would show unto this Court the following:

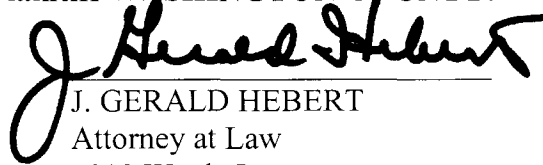
1. This is an action in which Washington County, Virginia seeks a bailout from coverage under Section 4 of the Voting Rights Act of 1965, as amended, 42 U.S.C. § 1973(b).
2. The defendants have consented to the requested bailout and the proposed Consent Judgment and Decree would grant a bailout to Washington County.

3. The proposed Consent Judgment and Decree is nearly identical to those that have been entered by other three-judge courts in declaratory judgment actions brought under Section 4 of the Voting Rights Act, as amended, 42 U.S.C. § 1973(b). *See, e.g., Amherst County, Virginia v. Mukasey*, C.A. No. 08-00780 (D.D.C. August 13, 2008); *Middlesex County, Virginia v. Gonzales*, No. 07-1485 (D.D.C. January 7, 2008); *Augusta County, VA v. Gonzales*, C.A. No. 05-1885 (D.D.C. 2005); *Greene County v. Ashcroft*, C.A. No. 03-1877 (D.D.C. Jan. 19, 2004); *City of Harrisonburg v. Ashcroft*, C.A. No. 02-00289 (D.D.C. April 17, 2002); *City of Winchester, VA v. Ashcroft*, C.A. No. 00-3073 (D.D.C. May 31, 2001); *Roanoke County, VA v. Reno*, C.A. No. 00-1949 (D.D.C. January 24, 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.

Respectfully submitted,

**For the Plaintiff WASHINGTON COUNTY:**



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