

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION - FRANKFORT**

JUDICIAL WATCH, INC.,

Plaintiff,

UNITED STATES OF AMERICA,

Proposed Plaintiff-Intervenor,

v.

ALISON LUNDERGAN GRIMES, et al.,

Defendants.

Civil No. 3:17-CV-94-GFVT-EBA

JOINT MOTION FOR ENTRY OF AGREED ORDER

The parties and proposed parties, through their undersigned counsel, respectfully move this Court to enter the accompanying Agreed Order. The parties and proposed parties have negotiated in good faith and agreed to entry of the proposed Agreed Order to resolve all claims in this action and to ensure compliance with Section 8 of the National Voter Registration Act, 52 U.S.C. § 20507. The parties and proposed parties share the goals of (1) improving the accuracy of voter registration records through a general program that makes a reasonable effort to remove the names of ineligible voters from the official lists of registered voters and (2) ensuring that Kentucky residents are not removed from official lists of registered voters absent the procedural safeguards set forth in the NVRA.

WHEREFORE, the parties and proposed parties move that the accompanying Agreed Order be entered by this Court.

AGREED AND CONSENTED TO, JUNE 12, 2018.

For proposed Plaintiff-Intervenor United States of America:

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Civil Rights Division

/s/ David G. Cooper

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Date: June 12, 2018

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Date: June 12, 2018

For Defendant Kentucky Secretary of State Alison Lundergan Grimes, in her official capacity:

/s/ Daniel Luke Morgan

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Date: June 12, 2018

For proposed Defendant Commonwealth of Kentucky State Board of Elections, and Defendant board members and Executive Director thereof:

/s/ Daniel Luke Morgan

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For proposed Defendant Commonwealth of Kentucky:

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Date: June 12, 2018

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2018, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ David G. Cooper
David G. Cooper