

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

STATE OF SOUTH CAROLINA,

Plaintiff,

v.

UNITED STATES OF AMERICA and  
ERIC H. HOLDER, JR.,  
in his official capacity as Attorney General,

Defendants,

and

JAMES DUBOSE, JUNIOR GLOVER,  
FAMILY UNIT, INC., BRENDA C.  
WILLIAMS, M.D., and AMANDA WOLF,

Defendant-  
Intervenors,

and

LEAGUE OF WOMEN VOTERS OF  
SOUTH CAROLINA and CRAIG  
DEBOSE,

Defendant-  
Intervenors,

and

SOUTH CAROLINA STATE  
CONFERENCE OF THE NAACP,  
KENYDA BAILEY, CHARMAINE BEAL,  
KIAKA DAVIS, EVIN PERCIVAL, and  
SEQUIOA WALLER,

Defendant-  
Intervenors

Case No. 1:12-cv-203 (CKK, BMK, JDB)

**MOTION OF DEFENDANT-INTERVENORS FOR LEAVE  
TO SUBMIT INFORMATION ON THE IMPACT OF ACT R54  
AS TO SOUTH CAROLINA VOTERS LACKING PHOTO ID**

Defendant-Intervenors submit this motion to seek the Court's permission to make a very brief submission, not to exceed five pages, by 2:00 PM on Monday, April 23, 2012 that will address the steps that South Carolina voters must take under Act R54 to qualify to vote after the State has implemented the Act pursuant to its terms. The Intervenors seek permission to make such a submission in light of the issues discussed with the Court during the telephonic conference held on April 20, 2012, and because Intervenors believe that such submission would be useful to the Court in its further deliberations over the case schedule. Counsel for South Carolina and the United States have informed the undersigned that they have no objection to Intervenors making the filing described above.

Dated: April 20, 2012  
New York, New York

Respectfully submitted,

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**CERTIFICATION PURSUANT TO THE COURT'S APRIL 4, 2012 ORDER**

Pursuant to the Court's Minute Order of April 4, 2012, the Defendant-Intervenors have consolidated their request for relief into a single motion. Further consolidation with the United States is inappropriate in this instance because, unlike the United States, the Defendant-Intervenors, who include both individuals affected by Act R54 and institutions whose voter empowerment activities will be affected by Act R54, can speak directly to the prejudice of a rushed implementation on South Carolina voters.

Dated: April 12, 2012

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on April 20, 2012, I filed the foregoing Motion for Leave with the Court's electronic filing system, which will provide notice to all counsel of record.

/s/ Theodore A.B. McCombs

Theodore A.B. McCombs