

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

MIDDLESEX COUNTY, VIRGINIA,	)	
a political subdivision of the	)	
Commonwealth of Virginia,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
MICHAEL B. MUKASEY,	)	
Attorney General of the	)	C.A. No. 07-cv-01485 (TFH)
United States of America,	)	
GRACE CHUNG BECKER,	)	(Three-judge court)
Acting Assistant Attorney General,	)	
Civil Rights Division, United States	)	
Department of Justice, Washington, DC,	)	
	)	
Defendants.	)	
_____	)	

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT AND DECREE

The plaintiff Middlesex County, Virginia, and the Defendants Michael B. Mukasey and Grace Chung Becker¹, 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 Middlesex County, Virginia seeks a bailout from coverage under Section 4 of the Voting Rights Act of 1965, as amended, 42 U.S.C. §1973b.
2. The defendants have consented to the requested bailout and the proposed Consent Judgment and Decree would grant a bailout to Middlesex County.

¹ Defendants Mukasey and Becker are successors in office and thus automatically substituted as parties for original defendants Gonzales and Kim. See Rule 25(d), Federal Rules of Civil Procedure.

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. §1973b. See, *e.g.*, *City of Fairfax, v. Reno*, C.A. No. 97-2212 (D.D.C. October 21, 1997); *Roanoke County, VA v. Reno*, C.A. No. 00-1949 (D.D.C. January 24, 2001); *City of Winchester, VA v. Ashcroft*, C.A. No. 00-3073 (D.D.C. May 31, 2001); *City of Harrisonburg v. Ashcroft*, C.A. No. 1:02CV00289 (D.D.C. April 17, 2002). *Greene County v. Ashcroft*, C.A. No. 03-1877 (D.D.C. Jan. 19, 2004); and *Augusta County, VA v. Gonzales*, C.A. No. 05-1885 (D.D.C. 2005). 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 MIDDLESEX COUNTY:

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