

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 3:12-CV-00069
v.	)	
	)	
THE TERRITORY OF THE VIRGIN	)	
ISLANDS; VIRGIN ISLANDS JOINT	)	
BOARDS OF ELECTIONS; BOARD OF	)	
ELECTIONS, ST. CROIX DISTRICT;	)	
BOARD OF ELECTIONS, ST. THOMAS/	)	
ST. JOHN DISTRICT; AND JOHN	)	
ABRAMSON, JR., VIRGIN ISLANDS	)	
SUPERVISOR OF ELECTIONS,	)	
in his official capacity,	)	
	)	
Defendants.	)	
	)	
	)	

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**JOINT MOTION AND BRIEF REQUESTING EXPEDITED**

**ENTRY OF REVISED PROPOSED CONSENT DECREE**

Plaintiff United States of America and Defendants, through their undersigned counsel, respectfully request this Court to enter the accompanying Consent Decree. Following the evidentiary hearing conducted this morning, the parties have continued to negotiate in good faith and revised their proposed Consent Decree, which is attached. The United States and Defendants agree to entry of this revised proposed Consent Decree as a necessary and appropriate resolution of the claims alleged in the Complaint. Expedited consideration and entry of the revised proposed Consent Decree is necessary to timely implement the agreed upon remedies in advance of the September 8, 2012 Federal primary election.

WHEREFORE, the parties respectfully request that the accompanying revised proposed Consent Decree be entered by this Court.

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