

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SHELBY COUNTY, ALABAMA,)
)
 Plaintiff,)
)
 vs.) Case: 1:10-cv-00651 (JDB)
)
 ERIC H. HOLDER, JR.,)
)
 Defendant,)
)
 and,)
)
 BOBBY PIERSON, WILLIE GOLDSMITH)
 SR., KENNETH DUKES, MARY)
 PAXTON-LEE, and ALABAMA STATE)
 CONFERENCE OF THE NAACP,)
)
 Defendant-Intervenors.)
 _____)

DEFENDANT-INTERVENORS' CROSS MOTION FOR SUMMARY JUDGMENT

Defendant-Intervenors Bobby Pierson, et al., move the Court pursuant to Rule 56, F.R.Civ. P., for an Order granting them summary judgment that Sections 4(b) and 5 of the Voting Rights Act, 42 U.S.C. §§ 1973b(b) and 1973c, as amended in 2006, are constitutional. There is no genuine issue as to any material fact and Defendant-Intervenors are entitled to judgment as a matter of law.

Defendant-Intervenors are filing a memorandum in support of their cross motion for summary judgment and a proposed Order. Defendant-Intervenors are also filing with the other Defendant-Intervenors in this case a Joint Statement of Material Fact As to Which There Is no Genuine Issue, and a Joint Notice of Lodging of Legislative History Documents.

Respectfully submitted,

s/Laughlin McDonald

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