

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

SHELBY COUNTY, ALABAMA,

Plaintiff,

v.

ERIC H. HOLDER, JR.,
in his official capacity as
ATTORNEY GENERAL OF THE
UNITED STATES,

Defendant,

EARL CUNNINGHAM, BOBBY PIERSON,
BOBBY LEE HARRIS, *et al.*,

Defendant-Intervenors.

Civil Action No. 1:10-cv-00651-JDB

**PLAINTIFF'S RESPONSES TO DEFENDANT'S AND DEFENDANT-INTERVENORS'
STATEMENTS OF UNCONTESTED MATERIAL FACTS**

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Pursuant to Local Rule 7(h), Plaintiff Shelby County, Alabama (“Shelby County”) submits the following responses to Defendant’s and Defendant-Intervenors’ Statements of Uncontested Material Facts (Docs. 53-1, 57). As demonstrated below, almost none of the 489 paragraphs of statements of material facts submitted by Defendant and Defendant-Intervenors contains facts “material” to the resolution of this case on summary judgment as they would not create a triable issue even if disputed. In particular, the bulk of Defendant-Intervenors’ 145-page joint statement (and several paragraphs of the Attorney General’s statement) consists of characterizations of testimony and other material in the legislative record, or discussions of case law. The inclusion of voluminous citations to this material appears to be an attempt to expand legal argument beyond the briefing limits established by this Court. *See, e.g.*, Mem. in Supp. of Def.-Intervenor Bobby Lee Harris’ Mot. for Summ. J & In Opp. to Pl.’s Mot. for Summ. J. (“Harris Opp”) at 32 (referring the Court to the more exhaustive recitation of the legislative record in the joint statement of material facts). Shelby County has not independently verified any citations to the congressional record, and thus neither admits nor denies that they accurately reflect that record.

**RESPONSE TO NUMBERED PARAGRAPHS IN STATEMENT OF
MATERIAL FACTS FILED BY DEFENDANT ERIC H. HOLDER**

1. Not disputed.
2. Although not disputed as to the facts, Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.
3. Disputed and incomplete, but not material. The Census Bureau tracks five races. According to the Census Bureau’s “QT-P5 Race Alone or in Combination: 2000—Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data for Shelby County, Alabama,” the number of persons identifying themselves as white in Shelby County in 2000 was 129,620

(128,671 white alone); the number identifying as black/African-American was 10,798 (10,606 black/African-American alone); the number identifying as American Indian/Alaska Native was 888 (473 American Indian/Alaska Native alone); the number identifying as Asian was 1,757 (1,477 Asian alone); and the number identifying as Native Hawaiian/Other Pacific Islander was 48 (26 Native Hawaiian/Other Pacific Islander alone). According to “QT-P9 Hispanic or Latino by Type: 2000—Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data,” the Census Bureau provides statistics about one ethnicity—Hispanic/Latino—and the number self-identifying as Hispanic/Latino of any race in Shelby County in 2000 was 2,910.

4. Disputed and incomplete, but not material. According to the Census Bureau’s “ACS Demographic and Housing Estimates: 2006-2008—Data Set: 2006-2008 American Community Survey 3-Year Estimates,” the total number of people who, in 2008, would self-identify their race as white alone in Shelby County was 157,622; black/African-American alone was 17,797; American Indian/Alaska Native alone was 600; Asian alone was 2,894; Native Hawaiian/Other Pacific Islander alone was 84; some other race alone was 2,307; and two or more races was 1,710. The number of people self-reporting as being of Hispanic/Latino ethnicity of any race in Shelby County in 2008 was 6,674.

5. Although not disputed as to the facts, Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

6. Not disputed.

7. Not disputed.

8. Not disputed.

9. Not disputed.

10. Not disputed.

11. Although not disputed as to the facts, Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

12. Not disputed.

13. Not disputed.

14. Although not disputed as to the facts, Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

15. Paragraph 15 contains statements characterizing the allegations and/or resolution of the *Dillard* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *Dillard* litigation as the best evidence of the issues presented therein.

16. Paragraph 16 contains statements characterizing the allegations and/or resolution of the *Dillard* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *Dillard* litigation as the best evidence of the issues presented therein.

17. Paragraph 17 contains statements characterizing the allegations and/or resolution of the *Dillard* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *Dillard* litigation as the best evidence of the issues presented therein.

18. Paragraph 18 contains statements characterizing the allegations and/or resolution of the *Dillard* litigation. These statements are not facts material to this litigation, and Shelby

County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *Dillard* litigation as the best evidence of the issues presented therein.

19. Paragraph 19 contains statements characterizing the allegations and/or resolution of the *Dillard* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *Dillard* litigation as the best evidence of the issues presented therein.

20. Paragraph 20 contains statements characterizing the allegations and/or resolution of the *Dillard* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *Dillard* litigation as the best evidence of the issues presented therein.

21. Paragraph 21 contains statements characterizing a preclearance submission by the City of Calera, Alabama. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County does not dispute that the City of Calera submitted certain voting changes to the Attorney General for preclearance in 2008. Shelby County refers the Court to the preclearance submission itself and the Attorney General's response as the best evidence of the issues presented therein.

22. Paragraph 22 contains statements characterizing a preclearance submission by the City of Calera, Alabama. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County does not dispute that the Attorney General objected on August 25, 2008 to certain voting changes

submitted by the City of Calera for preclearance. Shelby County refers the Court to the preclearance submission itself and the Attorney General's response as the best evidence of the issues presented therein.

23. Paragraph 23 contains statements characterizing a preclearance submission by the City of Calera, Alabama. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County does not dispute that the City of Calera submitted certain voting changes to the Attorney General for preclearance in 2008. Shelby County refers the Court to the preclearance submission itself and the Attorney General's response as the best evidence of the issues presented therein.

24. Paragraph 24 contains statements characterizing a preclearance submission by the City of Calera, Alabama. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County does not dispute that the City of Calera submitted certain voting changes to the Attorney General for preclearance in 2008. Shelby County refers the Court to the preclearance submission itself and the Attorney General's response as the best evidence of the issues presented therein.

25. Paragraph 25 contains statements characterizing the allegations and/or resolution of the *City of Calera* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *City of Calera* litigation as the best evidence of the issues presented therein.

26. Paragraph 26 contains statements characterizing the allegations and/or resolution of the *City of Calera* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County

refers the Court to the pleadings and various opinions of the courts in the *City of Calera* litigation as the best evidence of the issues presented therein.

27. Paragraph 27 contains statements characterizing the allegations and/or resolution of the *City of Calera* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *City of Calera* litigation as the best evidence of the issues presented therein.

28. Paragraph 28 contains statements characterizing the allegations and/or resolution of the *City of Calera* litigation. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the pleadings and various opinions of the courts in the *City of Calera* litigation as the best evidence of the issues presented therein.

29. Paragraph 29 contains statements characterizing a letter from Loretta King, Acting Assistant Attorney General, to Dan Head, Esq., dated September 25, 2009. These statements are not facts material to this litigation, and Shelby County declines to take a position on whether they are true or false. Shelby County refers the Court to the letter itself as the best evidence of its contents.

30. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

31. Paragraph 31 characterizes the Attorney General's approach to reviewing Section 5 preclearance submissions. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. Shelby County has no means of verifying its accuracy. This paragraph is therefore not admitted.

32. Paragraph 32 characterizes the Attorney General's Section 5 policies and regulations. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. Shelby County has no means of verifying the accuracy of any characterizations of federal preclearance policy. The contents of the cited federal regulations and Federal Register notices speak for themselves. This paragraph is therefore not admitted.

33. Paragraph 33 notes the existence of a website and characterizes its contents. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. The existence and content of the website speak for themselves. This paragraph is therefore not admitted.

34. Paragraph 34 characterizes 42 U.S.C. § 1973c. That provision speaks for itself, and Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. This paragraph is therefore not admitted.

35. Paragraph 35 characterizes 28 C.F.R. § 51.23. That provision speaks for itself, and Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. This paragraph is therefore not admitted.

36. Paragraph 36 notes the existence of a toll-free telephone number and characterizes its usefulness. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. Shelby County has no means of verifying the

accuracy of the characterization of the toll-free number. This paragraph is therefore not admitted.

37. Paragraph 37 characterizes 28 C.F.R. § 51.34 and the Attorney General's approach to reviewing Section 5 preclearance submissions. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. Shelby County has no means of verifying the accuracy of the Attorney General's characterizations of policy. This paragraph is therefore not admitted.

38. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

39. Shelby County does not dispute that it submitted information to the Attorney General in 2004 and 2007 via facsimile. The remainder of Paragraph 39 characterizes the Attorney General's approach to reviewing Section 5 preclearance submissions. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. Shelby County has no means of verifying the accuracy of the Attorney General's characterizations of policy. The remainder of Paragraph 39 is therefore not admitted.

40. Paragraph 40 notes the existence of a website and characterizes its usefulness. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. Shelby County has no means of verifying the accuracy of the characterization of the website. This paragraph is therefore not admitted.

41. Paragraph 41 notes that certain information can be submitted to the Attorney General via email. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment. This paragraph is therefore not admitted.

42. Paragraph 42 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

43. Paragraph 43 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

44. Paragraph 44 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

45. Paragraph 45 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

46. Paragraph 46 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

47. Paragraph 47 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County

disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

48. Paragraph 48 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

49. Paragraph 49 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

50. Paragraph 50 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

51. Paragraph 51 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

52. Paragraph 52 characterizes a provision of the Voting Rights Act concerning “bailout.” The best evidence of that provision’s contents is the provision itself. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

53. Although not disputed as to the facts, Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

54. Although not disputed as to the facts, Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

55. Shelby County has no means of verifying the accuracy of the statement in this paragraph. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

56. Shelby County has no means of verifying the accuracy of the statement in this paragraph. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

57. Paragraph 57 characterizes the Attorney General's approach to reviewing "bailout" requests. Shelby County has no means of verifying the accuracy of the stated approach. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

58. Paragraph 58 characterizes the Attorney General's approach to reviewing "bailout" requests. Shelby County has no means of verifying the accuracy of the stated approach. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

59. Not disputed.

60. Shelby County has no means of verifying the accuracy of the statement in this paragraph. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

61. Shelby County has no means of verifying the accuracy of the statement in this paragraph. Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

62. Although not disputed as to the facts, Shelby County disputes that this paragraph states facts that are material to the issues to be decided on summary judgment.

63. Shelby County does not dispute that the Attorney General ultimately consented to bailout by Northwest Austin Municipal Utility District Number One. Shelby County has no means of verifying the accuracy of the remainder of this paragraph. In any event, Shelby County disputes that any portion of this paragraph states facts that are material to the issues to be decided on summary judgment.

64. Shelby County does not dispute that it made the quoted statement in its opening brief. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

65. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

66. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

67. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

68. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

69. Paragraph 69 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney General's motion for summary judgment in this action. Mr. McCrary's statements concern his analysis of studies entered into the legislative record as part of the 2006 reauthorization of Section 5 as well as an analysis he performed independently subsequent to the 2006 reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

70. Paragraph 70 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney

General's motion for summary judgment in this action. Mr. McCrary's statements concern his analysis of studies entered into the legislative record as part of the 2006 reauthorization of Section 5 as well as an analysis he performed independently subsequent to the 2006 reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

71. Paragraph 71 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney General's motion for summary judgment in this action. Mr. McCrary's statements concern his analysis of studies entered into the legislative record as part of the 2006 reauthorization of Section 5 as well as an analysis he performed independently subsequent to the 2006 reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

72. Paragraph 72 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney General's motion for summary judgment in this action. Mr. McCrary's statements concern his

analysis of studies entered into the legislative record as part of the 2006 reauthorization of Section 5 as well as an analysis he performed independently subsequent to the 2006 reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

73. Paragraph 73 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney General's motion for summary judgment in this action. Mr. McCrary's statements concern his analysis of studies entered into the legislative record as part of the 2006 reauthorization of Section 5 as well as an analysis he performed independently subsequent to the 2006 reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment..

74. Paragraph 74 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney General's motion for summary judgment in this action. Mr. McCrary's statements concern his analysis of studies entered into the legislative record as part of the 2006 reauthorization of

Section 5 as well as an analysis he performed independently subsequent to the 2006 reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

75. Paragraph 75 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney General's motion for summary judgment in this action. Mr. McCrary's statements concern his analysis of studies entered into the legislative record as part of the 2006 reauthorization of Section 5 as well as an analysis he performed independently subsequent to the 2006 reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

76. Paragraph 76 consists of characterizations of statements made by Department of Justice employee Peyton McCrary in a declaration submitted in support of the Attorney General's motion for summary judgment in this action. Mr. McCrary's statements concern his analysis of studies entered into the legislative record as part of the 2006 reauthorization of Section 5 as well as an analysis he performed independently and subsequent to the 2006

reauthorization. Shelby County has not independently verified the accuracy of the Attorney General's representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Mr. McCrary's analysis was not part of the legislative record before Congress, and those studies speak for themselves. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

**RESPONSE TO NUMBERED PARAGRAPHS IN
DEFENDANT-INTERVENORS' JOINT STATEMENT OF MATERIAL FACTS**

1. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

2. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

3. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

4. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

5. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

6. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

7. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

8. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents.

Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

9. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

10. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

11. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

12. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

13. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

14. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

15. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

16. Paragraph 16 quotes Pub. L. No. 109-246 (2006). Shelby County refers the Court to the law itself as being the best evidence of its contents.

17. Paragraph 17 quotes Pub. L. No. 109-246 (2006). Shelby County refers the Court to the law itself as being the best evidence of its contents.

18. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents.

Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

19. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

20. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

21. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

22. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

23. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

24. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

25. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

26. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

27. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record, and thus this paragraph is not admitted. Shelby County refers the Court to the legislative record itself as the best evidence of its contents.

Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

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198. Shelby County has not independently verified the accuracy of the Defendant-Intervenors' representation of the legislative record. Shelby County refers the Court to the legislative record itself as the best evidence of its contents. Shelby County notes that this

paragraph also contains facts from outside the legislative record that Congress considered when it voted to reenact Section 5. Thus this paragraph is not admitted. Shelby County disputes that this paragraph states facts material to the issues to be decided on summary judgment.

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253. Paragraph 253 quotes Pub. L. No. 109-246 (2006). Shelby County refers the Court to the law itself as being the best evidence of its contents.

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395. Paragraph 395 quotes Pub. L. No. 109-246 (2006). Shelby County refers the Court to the law itself as being the best evidence of its contents.

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Dated: December 13, 2010

Respectfully submitted,

/s/ William S. Consovoy

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