

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

RALEIGH WAKE CITIZENS ASSOCIATION, *et al.*, )  
)

Plaintiffs, )

v. )

5:15-cv-156

THE WAKE COUNTY BOARD OF )  
ELECTIONS, )

Defendant. )

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CALLA WRIGHT, *et al.*, )

Plaintiffs, )

v. )

5:13-cv-607

THE WAKE COUNTY BOARD OF )  
ELECTIONS, )

Defendants. )

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**OBJECTIONS AND MOTION TO QUASH SUBPOENAS  
SERVED ON STATE LEGISLATORS**

**NOW COME** Senator John Chadwick Barefoot, Senator Robert A. Rucho, Representative David Ray Lewis, and Representative Paul Stam, (collectively “the legislative movants”), by and through undersigned counsel, and hereby submit objections and move to quash the subpoenas served on them by plaintiffs in the above-captioned action on the grounds that each of the legislative movants is entitled to legislative immunity, and the information sought by plaintiff’s in their subpoena is confidential and subject to legislative privilege. In addition, to the extent that

any of the information sought is subject to disclosure, the subpoenas are unreasonable because the period for compliance is unreasonably short given the overly broad request. The bases for the legislative movants' motion to quash is fully briefed in the memorandum in support of this motion, which is filed contemporaneously herewith and incorporated herein by reference as though fully set forth.

**WHEREFORE**, the legislative movants respectfully pray that the Court quash the subpoenas served on them by plaintiffs.

This the 4th day of November, 2015.

NORTH CAROLINA DEPARTMENT OF  
JUSTICE

By: /s/ Alexander McC. Peters

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*Counsel for Senator John Chadwick Barefoot,  
Senator Robert A. Rucho, Representative David Ray  
Lewis, and Representative Paul Stam*

**CERTIFICATE OF SERVICE**

I, Alexander McC. Peters, hereby certify that I have this day electronically filed the foregoing OBJECTIONS AND MOTION TO QUASH with the Clerk of Court using the CM/EFC system which will send notification of such filing to the following:

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This the 4th day of November, 2015.

/s/ Alexander McC. Peters  
Alexander McC. Peters  
Senior Deputy Attorney General