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18	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON	
19	BERTHA ARANDA GLATT,	
20	Plaintiff,	Case No.: 4:16-CV-05108-LRS
21	v.	JOINT MOTION TO EXPEDITE JOINT MOTION FOR ENTRY OF
22	CITY OF PASCO, et al.,	PARTIAL CONSENT DECREE
23	Defendants.	August 29, 2016 (without oral argument)
24		

JOINT MOTION TO EXPEDITE JOINT MOTION FOR ENTRY OF PARTIAL CONSENT DECREE - 1

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I. INTRODUCTION

Pursuant to Local Rule 7.1(h)(2)(C), all parties to this proceeding respectfully request that this Court consider the Parties' Joint Motion for Entry of Partial Consent Decree on an expedited basis. Local Rule 7.1(h)(2)(A) provides that a hearing date must generally be set at least 30 days after a motion's filing. However, the Court may alter these time requirements for time sensitive matters. Local Rule 7.1(h)(2)(C).

II. DISCUSSION

- 1. The matter before the Court is one where time is of the essence. As such, the Parties request that this Court review the Joint Motion for Entry of Partial Consent Decree on an expedited schedule to ensure that the City of Pasco will have resolution of questions regarding its City Council election system early enough that it can implement any new system in time for its 2017 elections. (Candidate filing for the 2017 Pasco City Council election begins on May 1, 2017 and ends May 17, 2017.)
- 2. The Voting Rights Act of 1965 was enacted to eradicate and prevent discrimination in voting opportunities. An election system that violates the Voting Rights Act must be struck down and a remedy imposed before any subsequent elections proceed. Timely remedial action is necessary in order to protect the important right to vote and participate in the political process. To ensure that the

Parties pursue remedial relief in a timely manner, the Parties have drafted a 1 2 timeline that includes a date for a meet-and-confer and subsequent deadlines for 3 presenting remedial election plans to the Court. 4 III. **CONCLUSION** 5 For the reasons set forth above, the Parties respectfully request that the Court 6 expedite the Joint Motion for Entry of Partial Consent Decree and note it for 7 September 2, 2016. 8 9 DATED this 22nd day of August, 2016. 10 /s/La Rond Baker Emily Chiang, WSBA No. 50517 11 echiang@aclu-wa.org La Rond Baker, WSBA No. 43610 12 lbaker@aclu-wa.org Breanne Schuster, WSBA No. 49993 13 bschuster@aclu-wa.org 14 AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON FOUNDATION 15 901 Fifth Avenue, Suite 630 Seattle, Washington 98164 16 Telephone: (206) 624-2184 17 /s/Brendan V. Monahan Brendan V. Monahan, WSBA No. 22315 18 bvm@stokeslaw.com 19 STOKES LAWRENCE VELIKANJE MOORE & **SHORE** 20 120 N. Naches Avenue Yakima, Washington 98901-2757 Telephone: (509) 853-3000 21 22 Attorneys for Plaintiff, Bertha Aranda Glatt 23 24 AMERICAN CIVIL LIBERTIES

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CERTIFICATE OF SERVICE 1 I hereby certify that on August 22, 2016, I caused the foregoing document to be: 2 Xelectronically filed with the Clerk of the Court using the CM/ECF system 3 which will send notification of such filing to the following: 4 5 **Emily Chiang** echiang@aclu-wa.org Brendan V. Monahan bvm@stokeslaw.com 6 bschuster@aclu-wa.org Breanne Schuster lkerr@kerrlawgroup.net Leland Barrett Kerr 7 jsafarli@floyd-ringer.com John A. Safarli 8 9 /s/La Rond Baker La Rond Baker, WSBA No. 43610 10 lbaker@aclu-wa.org 11 AMERICAN CIVIL LIBERTIES UNION OF WASHINGTON FOUNDATION 12 901 Fifth Avenue, Suite 630 Seattle, Washington 98164 13 Telephone: (206) 624-2184 14 15 16 17 18 19 20 21 22 23 24