

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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COMMON CAUSE NEW YORK, as an	:	
organization and on behalf of its members,	:	
Plaintiff,	:	
-against-	:	
ROBERT A. BREHM, Co-Executive Director,	:	Case No. 1:17-cv-06770-AJN
TODD D. VALENTINE, Co-Executive	:	
Director, PETER S. KOSINSKI, Co-Chair,	:	
DOUGLAS A. KELLNER, Co-Chair,		
ANDREW J. SPANO, Commissioner, and		
GREGORY P. PETERSON, Commissioner,		
in their official capacities as Commissioners of		
the NEW YORK STATE BOARD OF		
ELECTIONS,		
Defendants.		
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NOTICE OF MOTION FOR LEAVE TO AMEND

PLEASE TAKE NOTICE THAT, in accordance with Paragraph 5 of the Civil Case Management Plan and Scheduling Order (Dkt. 65) and upon the Memorandum of Law and the Declaration of Neil A. Steiner and the exhibit annexed thereto and submitted herewith, Plaintiff Common Cause/New York ("Plaintiff") will move this Court, at the United States Courthouse 40 Foley Square New York, New York 10007, at a time and place designated by the Court, for an Order, pursuant to Fed. R. Civ. P. 15(a)(2), granting Plaintiff leave to file its First Amended Complaint (attached as Exhibit A to the Declaration of Neil A. Steiner), and for such other and further relief as the Court deems just and proper. As reflected in the proposed First Amended

Complaint, Plaintiff seeks to add a claim under the Fourteenth Amendment of the United States Constitution.

Dated: November 30, 2018

Respectfully submitted,

By: /s/ Neil A. Steiner

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CERTIFICATE OF SERVICE

I hereby certify that on this November 30, 2018 I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Neil A. Steiner