## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA

THE ALABAMA STATE CONFERENCE OF THE NAACP, et al.,

Plaintiffs,

v.

Civil Case No. 2:18-cv-02056-LSC

CITY OF PLEASANT GROVE, et al.

Defendants.

## PLAINTIFFS' MOTION TO FILE UNDER SEAL AN EXHIBIT CONTAINING JEFFERSON COUNTY VOTER LIST

Plaintiffs the Alabama State Conference of the NAACP, Eric Calhoun, and Jennifer Ford, by and through their undersigned counsel, respectfully move the Court for an order permitting them to file under seal an exhibit in support of their forthcoming Opposition to Defendants' Motion to Dismiss (Doc. 14). The exhibit in question is an Excel spreadsheet consisting of a Jefferson County voter list containing voter history data, which includes personally identifiable information for each registered voter. To prevent these sensitive personal data identifiers from being made part of the public record, Plaintiffs respectfully request that the Court issue the proposed attached order permitting them to file under seal the exhibit containing the voter list.

## Respectfully submitted on February 21, 2019,

/s/ John Z. Morris

Leah C. Aden\*

Deuel Ross\*

John Z. Morris\*

NAACP LEGAL DEFENSE AND

EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

Phone: (212) 965-2200

Fax: (212) 226-7592

laden@naacpldf.org

dross@naacpldf.org

zmorris@naacpldf.org

NAACP LEGAL DEFENSE AND

EDUCATIONAL FUND, INC.

700 14th Street NW, Suite 600

Washington, DC 20005

/s/ James U. Blacksher

Bar No. ASB-2381-S82J

Birmingham, AL 35201

Phone: (205) 591-7238 Fax: (866) 845-4395

/s/ Catherine Meza

Catherine Meza\*

iblacksher@ns.sympatico.ca

James U. Blacksher

P.O. Box 636

Phone: (202) 682-1300

Fax: (212) 226-7592 cmeza@naacpldf.or

\*Pro Hac Vice

## **CERTIFICATE OF SERVICE**

I certify that on February 21, 2019, I filed the foregoing Plaintiffs' Motion to File Under Seal electronically via the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ John Z. Morris
John Z. Morris
NAACP Legal Defense and
Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, New York 10006
Tel: (212) 965-2200

Fax: (212) 226-7592 zmorris@naacpldf.org