UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE, SPRING VALLEY BRANCH; JULIO CLERVEAUX, CHEVON DOS REIS; ERIC GOODWIN; JOSE VITELIO GREGORIO; DOROTHY MILLER; HILLARY MOREAU; AND WASHINGTON SANCHEZ,
 	
            Plaintiffs,
 	
    v.
 	
EAST RAMAPO CENTRAL SCHOOL DISTRICT AND MARYELLEN ELIA, IN HER CAPACITY AS THE COMMISSIONER OF EDUCATION OF THE STATE OF NEW YORK,
 	
            Defendants.
	17 Civ. 8943 (CS) (JCM)

NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that upon the annexed Declaration of Claudia T. Salomon, and

upon the separately bound Memorandum of Law and Declarations referenced in the oral argument

request, the undersigned, on behalf of Plaintiffs, hereby move this Court, before the Honorable

Cathy Seibel, United States District Judge, in Courtroom 621 of the United States Courthouse for

the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601, for an

order granting a preliminary injunction and for such other relief as this Court deems just and

proper, pursuant to Rule 65 of the Federal Rules of Civil Procedure, enjoining Defendants East

Ramapo Central School District ("East Ramapo" or the "District") and MaryEllen Elia, in her

capacity as the Commissioner of Education of the State of New York, from holding elections for

members of the District's Board of Education (the "Board") until the District's voting system no

longer violates Section 2 of the Voting Rights Act, 52 U.S.C. § 10301(a).

Dated: December 7, 2017
      New York, New York.   Respectfully submitted,

                              <u>/s/ Claudia T. Salomon</u>
                              Claudia T. Salomon
                              Corey A. Calabrese
                              Elizabeth A. Parvis
                              Claudia.Salomon@lw.com
                              Corey.Calabrese@lw.com
                              Elizabeth.Parvis@lw.com
                              Latham & Watkins LLP
                              885 Third Avenue
                              New York, NY 10022
                              Phone: (212) 906-1200

                              Arthur Eisenberg
                              Perry Grossman
                              Kevin Jason
                              aeisenberg@nyclu.org
                              pgrossman@nyclu.org
                              kjason@nyclu.org
                              New York Civil Liberties Union Foundation
                              125 Broad Street
                              New York, NY 10004
                              Phone: (212) 607-3329

                              Attorneys for Plaintiffs