

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No. 10-cv-06800
v.)	Judge: Hibbler
)	
THE STATE OF ILLINOIS;)	
THE ILLINOIS STATE BOARD OF)	
ELECTIONS; and DANIEL WHITE,)	
Executive Director of the Illinois State)	
Board of Elections,)	
)	
Defendants.)	
)	
)	
)	

JOINT MOTION REQUESTING ENTRY OF CONSENT DECREE

Plaintiff United States of American and Defendants, through their undersigned counsel, respectfully request this Court to enter the accompanying Consent Decree. The Complaint in this action, alleging a violation of the Uniformed and Overseas Citizens Absentee Voting Act, 42 U.S.C. §§ 1973ff to 1973ff-7, is being filed simultaneously with this motion. The United States and the Defendants have negotiated in good faith and have agreed to entry of this Consent Decree as a necessary and appropriate resolution of the claims alleged.

WHEREFORE, the parties request that the accompanying Consent Decree be entered by this Court.

AGREED AND CONSENTED TO, October 22, 2010

For the Plaintiff:

ERIC H. HOLDER, JR.
Attorney General

PATRICK J. FITZGERALD
United States Attorney
Northern District of Illinois

THOMAS E. PEREZ
Assistant Attorney General
Civil Rights Division

By: /s/ Patrick W. Johnson
PATRICK W. JOHNSON
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 353-5327
patrick.johnson2@usdoj.gov

/s/ Justin Weinstein-Tull
T. CHRISTIAN HERREN JR.
REBECCA WERTZ
LEMA BASHIR
JUSTIN WEINSTEIN-TULL
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530
Telephone: (202) 353-0319
Facsimile: (202) 307-3961

Attorney for the Defendants:

LISA MADIGAN
Attorney General of Illinois

/s/ Kathleen Kreisel Flahaven
KATHLEEN KREISEL FLAHAVEN
THOMAS A. IOPPOLO
S. ANN WALLS
Assistant Attorneys General
General Law Bureau
100 W. Randolph Street, 13th Floor
Chicago, Illinois 60601
Telephone: (312) 814-2822
Facsimile: (312) 814-4425

CERTIFICATE OF SERVICE

I hereby certify that on October 22, 2010, I served a true and correct copy of the foregoing via mail to the following counsel of record:

KATHLEEN KREISEL FLAHAVEN
THOMAS A. IOPPOLO
S. ANN WALLS
General Law Bureau
100 W. Randolph Street, 13th Floor
Chicago, Illinois 60601
Telephone: (312) 814-3313
Facsimile: (312) 814-4425

STEVE SANDVOSS
1020 S. Spring St.
Springfield, IL 62704
Phone: (217) 782-4141
Fax: (217) 782-5959

/s/ Justin Weinstein-Tull
Justin Weinstein-Tull