

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

CITY OF BEDFORD, VIRGINIA,)	
a political subdivision of the)	
Commonwealth of Virginia,)	
215 East Main Street,)	
Bedford, Virginia 24523)	
)	
Plaintiff,)	
)	
v.)	
)	
ERIC HOLDER,)	
Attorney General of the)	Civil Action No. _____
United States of America;)	
THOMAS E. PEREZ,)	
Assistant Attorney General,)	
Civil Rights Division, United States)	
Department of Justice, Washington, DC,)	Three-Judge Court Requested
)	
Defendants.)	
_____)	

PLAINTIFF'S UNOPPOSED MOTION TO CONVENE THREE-JUDGE COURT

The plaintiff City of Bedford, Virginia, though counsel, respectfully moves this Court for entry of an order requesting the convening of a three-judge court. As grounds for this motion, the plaintiff would show unto the Court that:

1. Plaintiff City of Bedford has filed this action pursuant to Section 4 of the Voting Rights Act of 1965, as amended, 42 U.S.C. §1973b. Plaintiff's action seeks a declaratory judgment from this Court granting the City an exemption, known as a "bailout", from the special remedial provisions of the Voting Rights Act.
2. A three-judge court is required under Section 4 of the Voting Rights Act: "A district court of three-judges shall be convened to hear and determine the action." See 42 U.S.C. §1973b.

3. A memorandum of points and authorities accompanies this motion, and a proposed order is respectfully submitted for the Court's consideration.

4. Counsel for defendants has advised plaintiff's counsel that defendants do not oppose this motion.

WHEREFORE, Plaintiff respectfully prays that this Court will grant this motion and enter the attached order requiring the clerk of this Court to notify the Chief Judge of the United States Court of Appeals for the D.C. Circuit that a three-judge court is required to hear and determine this action.

Respectfully submitted,

FOR THE PLAINTIFF CITY OF BEDFORD:

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