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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN MARIANA ISLANDS**

JOHN H. DAVIS, JR.

Plaintiff,

v.

**COMMONWEALTH ELECTION
 COMMISSION; FRANCIS M. SABLAN,
 Chairperson of the Commonwealth Election
 Commission; ROBERT A. GUERRERO,
 Executive Director of the Commonwealth
 Election Commission; ELOY INOS,
 Governor of the Commonwealth of the
 Northern Mariana Islands.**

Defendants.

CIVIL CASE No. 14-0002

**CROSS MOTION FOR SUMMARY
 JUDGMENT**

Judge: Ramona V. Manglona

Date: April 24, 2014.

Time: 1:30 P.M.

COMES NOW, defendants Commonwealth Election Commission (“CEC”), Francis M. Sablan, Chairperson of the CEC, Robert A. Guerrero, Executive Director of CEC, and Eloy Inos, Governor of the Commonwealth of the Northern Mariana Islands (collectively “Defendants”), by and through counsel, Charles E. Brasington, and hereby move under Federal Rule of Civil Procedure 56 for summary judgment in their favor.

As grounds for the Cross Motion, Defendants would show that there are no questions of material fact, and that the acts of Defendants do not violate the Fourteenth or Fifteenth Amendments to the U.S. Constitution, or 42 U.S.C. § 1971. The legal basis for the motion is

1 more fully set forth in the Memorandum in support of this Motion which is filed
2 contemporaneously with this Motion.

3 WHEREFORE, PREMISES CONSIDERED, Defendants pray that the Court enter
4 summary judgment in their favor.
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6 RESPECTFULLY SUBMITTED.

7 DATED: March 20, 2014

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10 /s/
11 Charles E. Brasington
12 Assistant Attorney General
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CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing has been electronically filed this 25th day of June 2012, with service requested to all parties of record.

OFFICE OF THE ATTORNEY GENERAL

/s/
Charles E. Brasington (T0085)
Assistant Attorney General