

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

INDIANA STATE CONFERENCE OF  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE  
(NAACP); JEROME A. PRINCE; DAVID  
WOERPEL; PAUL BUCK; PATRICIA  
HINTON; MELVIN MAGEE; ANNIE  
STEWART; KIMBERLY RODRIGUEZ,

Plaintiffs,

v.

CONNIE LAWSON, in her official capacity as  
Secretary of State of Indiana; INDIANA  
ELECTION COMMISSION; BRYCE H.  
BENNETT, JR., in his official capacity as  
Chair of the Indiana Election Commission;  
ANTHONY LONG, in his official capacity as  
Vice-Chair of the Indiana Election  
Commission; SUZANNAH WILSON  
OVERHOLT, in her official capacity as a  
Member of the Indiana Election Commission;  
and ZACHARY E. KLUTZ, in his official  
capacity as a Member of the Indiana Election  
Commission; INDIANA ELECTION  
DIVISION; J. BRADLEY KING, in his official  
capacity as Co-Director of the Indiana Election  
Division; and ANGELA M. NUSSMEYER, in  
her official capacity as Co-Director of the  
Indiana Election Division,

Defendants.

Civil Action No. 2:17-cv-334

**NOTICE OF CLAIM OF  
UNCONSTITUTIONALITY**

Pursuant to Federal Rule of Civil Procedure 5.1. and the Local Rule 5.1-1 of the Northern District of Indiana, Plaintiffs hereby submit this Notice of Claim of Unconstitutionality regarding the provision in Indiana Senate Bill 220, codified at Ind. Code § 3-6-5.2-10 (the “Lake County Precinct Consolidation Law”) that requires Lake County, Indiana to immediately consolidate its “small precincts.” In the above captioned action, Plaintiffs are challenging the Lake County Precinct Consolidation Law, on the grounds that it violates Section 2 of the Voting Rights Act,

52 U.S.C. § 10301, and the First, Fourteenth, and Fifteenth Amendments to the U.S. Constitution.

The Complaint is attached to this notice.

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Dated: August 11, 2017

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th of August 2017, I filed the foregoing Clerk of Court using the CM/ECF system, and that the foregoing will be served on the following persons:

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