

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division**

**LEAGUE OF WOMEN VOTERS OF  
VIRGINIA; KATHERINE D.  
CROWLEY; ERIKKA GOFF; and  
SELJRA TOOGOOD,**

**Plaintiffs,**

**v.**

**VIRGINIA STATE BOARD OF  
ELECTIONS; ROBERT H. BRINK,  
JOHN O'BANNON, and JAMILAH D.  
LECRUISE, in their official capacities as  
Chairman, Vice-Chair, and Secretary of  
the Virginia State Board of Elections,  
respectively; and CHRISTOPHER E.  
PIPER, in his official capacity as  
Commissioner of the Virginia Department  
of Elections,**

**Defendants.**

**Case No. 6:20-cv-00024-NKM**

**JOINT MOTION FOR ENTRY OF PARTIAL CONSENT JUDGMENT AND DECREE**

Plaintiffs and Defendants (collectively, the “Parties”) seek approval of a partial consent judgment and decree that would vindicate the public interests of ensuring access to the ballot, protecting election integrity, and promoting public health during the COVID-19 pandemic. Specifically, the agreement would stop enforcement for Virginia’s June 23 primary of the requirement that Virginia absentee voters have another individual observe them removing their absentee ballot from the envelope and then have that individual sign as a witness (the “witness requirement”) for voters who believe they may not safely have a witness present while completing their ballot. In support of their motion, the Parties rely upon the attached proposed

Partial Consent Judgment and Decree and accompanying Brief in Support of Joint Motion for Entry of a Partial Consent Judgment and Decree.

This agreement represents a fair, adequate, and reasonable arrangement, negotiated through fast-paced but thorough conversations that have produced an agreement that will benefit all parties while serving the public interest. The Parties therefore request that the Court enter this agreement, which will provide certainty well in advance of the June 23 primary while allowing all qualified Virginians to vote and protect their health.

Dated: April 27, 2020

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on April 27, 2020, I served a copy of the foregoing Joint Motion for Entry of Partial Consent Judgment and Decree via filing with the Court's CMECF system, which sent copies of this document to Counsel of Record.

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