

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

PEOPLE FIRST OF ALABAMA)
et al.,)

v.)

CASE NO. 2:20-cv-00619-AKK

JOHN MERRILL, in his official)
capacity as Secretary of State of)
Alabama *et al.*,)

JOINT MOTION FOR ENTRY OF SETTLEMENT

The Plaintiffs and Defendant Mary B. Roberson, in her official capacity as Circuit Clerk of Lee County, Alabama, (“Mrs. Roberson”) give notice to the Court that they have reached a settlement in this lawsuit. Pursuant to the terms of the governing Settlement Agreement (“the Settlement Agreement”), the Plaintiffs and Mrs. Roberson provide the following:

1. Upon the entry of the attached proposed order, the Plaintiffs dismiss with prejudice Mrs. Roberson, in her official capacity as Circuit Clerk of Lee County, Alabama, from this lawsuit.
2. The Settlement Agreement is incorporated by reference to this motion and the proposed order.
3. The Plaintiffs and Mrs. Roberson consent to this Court retaining jurisdiction to enforce the terms of the Settlement Agreement.

4. This dismissal does not affect the Plaintiffs' remaining claims against any other parties to this lawsuit, including against any person serving in the official capacity as Absentee Election Manager of Lee County, Alabama.

Respectfully submitted on June 30, 2020,

/s/ Robert J. Sewell
Attorney for Defendant

OF COUNSEL:

Brandon K. Essig

bessig@lightfootlaw.com

Robert J. "Jay" Sewell

jsewell@lightfootlaw.com

LIGHTFOOT, FRANKLIN & WHITE, LLC

The Clark Building

400 20th Street North

Birmingham, Alabama 35203

(205) 581-0700

(205) 581-0799 (Facsimile)

/s/ Deuel Ross (with permission)
Attorney for Plaintiffs

OF COUNSEL:

Deuel Ross*

Natasha C. Merle*

Liliana Zaragoza*

NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.

40 Rector Street, 5th Floor

New York, NY 10006

P: (212) 965-2200

dross@naacpldf.org

nmerle@naacpldf.org

lzaragoza@naacpldf.org

Mahogane D. Reed*

NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.

700 14th Street N.W.Ste.600

Washington, DC 20005

P: (202) 682-1300

mreed@naacpldf.org

William Van Der Pol (ASB-211214F)

Jenny Ryan (ASB-5455-Y84J)

ALABAMA DISABILITIES

ADVOCACY PROGRAM

Box 870395

Tuscaloosa, AL 35487

P: (205)348-4928

wvanderpoljr@adap.ua.edu

jrryan2@adap.ua.edu

Caren E. Short (ASB-0646-P48N)

Nancy G. Abudu*

SOUTHERN POVERTY LAW

CENTER

PO Box 1287

Decatur, GA 30031

P: (404) 521-6700

F: (404) 221-5857

caren.short@splcenter.org

nancy.abudu@splcenter.org

Sara Zampierin (ASB-1695-S34H)

SOUTHERN POVERTY LAW

CENTER

400 Washington Avenue

Montgomery, AL 36104

P: (334) 956-8200

F: (334) 956-8481

sara.zampierin@splcenter.org

*Admitted *Pro Hac Vice*

CERTIFICATE OF SERVICE

I certify that on June 30, 2020, I filed the foregoing document electronically the CM/ECF system, which will automatically serve all counsel of record.

/s/ Robert J. Sewell
OF COUNSEL