STATE OF NORTH CAROLINA) IN THE GENERAL COURT OF JUSTICE) SUPERIOR COURT DIVISION) CASE NO. 19 CVS 15941
WAKE COUNTY	12011 MAR 30 P 3: 39
COMMUNITY SUCCESS INITIATIVE, et al.,	WAKE CO., C.S.C.
Plaintiffs,)) <u>NOTICE OF APPEAL</u>
vs.)
TIMOTHY K. MOORE, et al.,))
Defendants.	

TO THE HONORABLE COURT OF APPEALS OF NORTH CAROLINA:

Defendants Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, and Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate (the "Legislative Defendants"), by and through counsel, pursuant to Rule 3(a) of the North Carolina Rules of Appellate Procedure, do hereby notice their appeal to the Court of Appeals of North Carolina from 1) the Final Judgment and Order of the three-judge panel composed of the Honorable Lisa C. Bell, Keith O. Gregory, and John M. Dunlow entered on March 28, 2022 in the Superior Court, Wake County declaring N.C.G.S. §13-1 in violation of the North Carolina Constitution's Equal Protection Clause and Free Elections Clause and enjoining Defendants from preventing any person convicted of a felony from registering to vote or voting due to probation, parole, or post-release supervision and 2) the Summary Judgment Order entered on September 4, 2020 by this same panel declaring that N.C.G.S. §13-1 violates the Ban on Property Qualifications of the North Carolina Constitution and the Equal Protection Clause of the North Carolina Constitution.

Respectfully submitted, this the 30th day of March, 2022.

Nicole Jo Moss

NC Bar No. 31958

COOPER & KIRK, PLLC

1523 New Hampshire Avenue, NW

Washington, D.C. 20036

Telephone: (202) 220-9600 Facsimile: (202) 220-9601

nmoss@cooperkirk.com

Nathan Huff

North Carolina Bar #40626

K&L Gates

430 Davis Drive

Suite 400

Morrisville, NC 27560

Telephone: (919) 314-5636

Facsimile: (919) 516-2045

Nate.Huff@klgates.com

Counsel for Legislative Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion was served on the parties to this action via email to counsel at the following addresses:

FORWARD JUSTICE 400 Main Street, Suite 203 Durham, NC 27701

Telephone: (984) 260-6602

Daryl Atkinson

daryl@forwardjustice.org

Caitlin Swain

cswain@forwardjustice.org

Whitley Carpenter

wearpenter@forwardjustice.org

Kathleen Roblez

kroblez@forwardjustice.org

Ashley Mitchell

amitchell@forwardjustice.org

ARNOLD & PORTER KAYE

SCHOLER LLP

601 Massachusetts Avenue NW

Washington, DC 20001

Telephone: (202) 942-5000

Elisabeth Theodore*

elisabeth.theodore@arnoldporter.com

R. Stanton Jones*

stanton.jones@arnoldporter.com

PROTECT DEMOCRACY PROJECT

2120 University Avenue

Berkeley, CA 94704

Telephone: (858) 361-6867

Farbod K. Faraji*

farbod.faraji@protectdemocracy.org

Counsel for Plaintiffs

This the 30th day of March, 2022.

NORTH CAROLINA DEPARTMENT

OF JUSTICE

Post Office Box 629

Raleigh, NC 27602

Telephone: (919) 716-0185

Terence Steed

tsteed@ncdoj.gov

Counsel for the State Board

Defendants

Wicole to Moss

Counsel for Legislative Defendants