

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Civil No. 5:25-cv-00283-M-RJ

UNITED STATES OF AMERICA,

Plaintiff,

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS; SAM HAYES, in his official
capacity as Executive Director of the North
Carolina State Board of Elections; FRANCIS
X. DE LUCA, JEFF CARMON, STACY
EGGERS IV, SIOBHAN O'DUFFY MILLEN,
and ROBERT RUCHO, in their official
capacities as Members of the North Carolina
State Board of Elections; and STATE OF
NORTH CAROLINA,

Defendants.

**JOINT MOTION FOR ENTRY OF
CONSENT JUDGMENT AND ORDER**

Plaintiff the United States of America and Defendants – North Carolina State Board of Elections (the “NCSBE”); Sam Hayes, in his official capacity as Executive Director of the NCSBE; Francis X. De Luca, Jeff Carmon, Stacy Eggers IV, Siobhan O’Duffy Millen, and Robert Rucho, in their official capacities as Members of the NCSBE (collectively “State Board Defendants”); and the State of North Carolina, acting through North Carolina’s chief State elections official as defined in 52 U.S.C. § 21083, hereby jointly and respectfully request that this Court enter the proposed Consent Judgment and Order attached hereto as Exhibit A. In support of

this motion, the Parties submit the accompanying Memorandum in Support and a proposed order granting the joint motion.

Dated this 3rd day of September, 2025.

Respectfully submitted,

For the United States of America:

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For State Board Defendants and the State,
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NORTH CAROLINA
DEPARTMENT OF JUSTICE

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