

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

ALABAMA LEGISLATIVE)
BLACK CAUCUS, et al.,)
)
Plaintiffs,)

Case No. 2:12-cv-691
WKW-MHT-WHP

THE STATE OF ALABAMA, et al.,)
)
Defendants.)

_____)
)
DEMETRIUS NEWTON, et al.,)
)
Plaintiffs,)

Case No. 2:12-cv-1081
WKW-MHT-WHP

v.)
)
THE STATE OF ALABAMA, et al.,)
)
Defendants.)

**MOTION FOR SUMMARY JUDGMENT WITH
RESPECT TO REMAINING CLAIM OF THE ALBC PLAINTIFFS
OF RACE-BASED VOTE DILUTION AND ISOLATION**

Pursuant to Federal Rule of Civil Procedure 56, the State of Alabama and
Beth Chapman, in her official capacity as Secretary of State of Alabama,
defendants in this action (the “ALBC State Defendants”), move for entry of

summary judgment in their favor and against the ALBC Plaintiffs on their remaining claim of race-based vote dilution and isolation. As grounds for this Motion, the ALBC State Defendants state that they are entitled to judgment as a matter of law and there are no genuine issues of material fact.

Additional grounds for this Motion are set forth in the Memorandum in Support of Motion for Summary Judgment and the affidavits that were included in the ALBC State Defendants Response in opposition to the ALBC Plaintiffs' Motion for Partial Summary Judgment.

Respectfully submitted,

Date June 17, 2013

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CERTIFICATE OF SERVICE

I hereby certify that, on June 17, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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