

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division

|                                 |   |   |
|---------------------------------|---|---|
| GOLDEN BETHUNE-HILL, et al.,    | ) |   |
|                                 | ) |   |
| Plaintiffs,                     | ) |   |
|                                 | ) |   |
| v.                              | ) |   |
|                                 | ) |   |
| VIRGINIA STATE BOARD OF         | ) | Civil Action No. 3:14-cv-00852-REP-AWA- |
| ELECTIONS, et al.,              | ) | BMK                                     |
|                                 | ) |   |
| Defendants,                     | ) |   |
| and                             | ) |   |
|                                 | ) |   |
| WILLIAM J. HOWELL, SPEAKER OF   | ) |   |
| THE HOUSE OF DELEGATES, and THE | ) |   |
| HOUSE OF DELEGATES,             | ) |   |
|                                 | ) |   |
| Intervenor-Defendants.          | ) |   |

**DEFENDANTS’ PRE-TRIAL SUBMISSION**

In response to the Court’s July 13, 2017 Order (ECF No. 173), and consistent with their role in this litigation,<sup>1</sup> Defendants, the Virginia State Board of Elections, *et al.*, are not filing their own pre-trial brief but join the arguments offered by Defendant-Intervenors (ECF No. 203).

Respectfully submitted,

VIRGINIA STATE BOARD OF ELECTIONS;  
JAMES B. ALCORN, in his capacity as Chairman  
of the Virginia State Board of Elections; CLARA  
BELLE WHEELER, in her capacity as Vice-Chair  
of the Virginia State Board of Elections;  
SINGLETON B. McALLISTER, in her capacity as  
Secretary of the Virginia State Board of Elections;

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<sup>1</sup> See Defs.’ Statement of Position, ECF No. 147; Defs.’ Resp. to the Parties’ Statements of Position & to the Issues Raised in the Court’s April 21, 2017 Order, ECF No. 150; Defs.’ Resp. to the Court’s May 5, 2017 Order, ECF No. 156.



