

No. 21-1533

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

LATASHA HOLLOWAY, *et al.*,

Plaintiffs/Appellees,

v.

CITY OF VIRGINIA BEACH, *et al.*,

Defendants/Appellants.

On Appeal from the United States District Court
for the Eastern District of Virginia, Norfolk Division

JOINT STATUS REPORT

JOINT STATUS REPORT

Pursuant to the Court's July 12, 2021 Order, the parties submit this Joint Status Report regarding the remedial proceedings in the district court. As explained in the prior report, the court-appointed special master has issued a report and recommendation with a proposed remedial plan. The district court afforded the parties 21 days to provide comments to the court, and the parties timely filed briefs. The district court subsequently asked for briefs responding to the parties' respective briefs, and the parties filed those briefs on Tuesday, December 7.

The district court has stated that it "will consider the comments of the parties and make any adjustments deemed appropriate before adopting the proposed remedial plan that the Special Master prepared." Dist. Ct. Dkt. 281 at 2. The district court did not indicate when it will adopt the special master's plan.¹

¹ Appellants reiterate their objection to the abeyance ordered by this Court on July 12, 2021, but see no need to file a separate status report at this time.

December 9, 2021

Annabelle E. Harless
CAMPAIGN LEGAL CENTER
55 W. Monroe St., Ste. 1925
Chicago, IL 60603
Phone: 312-312-2885
aharless@campaignlegal.org

Mark D. Stiles
Virginia Beach City Attorney
Christopher S. Boynton
Deputy City Attorney
Gerald L. Harris
Senior City Attorney
Joseph M. Kurt
Assistant City Attorney
OFFICE OF THE CITY ATTORNEY
Municipal Center, Bldg. One, Rm.
260
2401 Courthouse Drive
Virginia Beach, Virginia 23456

Erika Dackin Prouty
BAKER & HOSTETLER LLP
200 Civic Center Drive
Suite 1200
Columbus, OH 43215

Respectfully submitted,

/s/ Mark P. Gaber
Mark P. Gaber
J. Gerald Hebert
Robert N. Weiner
CAMPAIGN LEGAL CENER
1101 14th St. NW, Ste. 400
Washington, DC 20005
Phone: (202) 736-2200
Facsimile: (202) 736-2222
mgaber@campaignlegal.org
ghebert@campaignlegal.org
rweiner@campaignlegal.org

Counsel for Plaintiffs/Appellees

/s/ Richard B. Raile
Katherine L. McKnight
Richard B. Raile
BAKER & HOSTETLER LLP
1050 Connecticut Ave., N.W.
Washington, D.C. 20036
T: (202) 861-1618
F: (202) 861-1783
kmcknight@bakerlaw.com

Patrick T. Lewis
BAKER & HOSTETLER LLP
Key Tower, 127 Public Square
Suite 2000
Cleveland, OH 44114

Counsel for Defendants-Appellants