IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al., *Plaintiffs,* v. REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al., *Defendants*.	Civil Action No. 23 CV 1057
NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al., *Plaintiffs,* v. PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al., *Defendants.*	Civil Action No. 23 CV 1104

PLAINTIFFS' JOINT MOTION FOR EXPEDITED BRIEFING SCHEDULE, HEARING DATE, AND DECISION ON MOTIONS FOR PRELIMINARY INJUNCTION

Pursuant to Local Rule 7.3(f), the Williams Plaintiffs and the NAACP Plaintiffs (collectively, "Plaintiffs") respectfully move the Court to expedite the briefing schedule, hearing, and decision on the NAACP Plaintiffs' Motion for Preliminary Injunction (Doc. 182) and the Williams Plaintiffs' Motion for Preliminary Injunction (forthcoming) (together, the "PI Motions").

Plaintiffs request that the Court adopt the expedited schedule as set forth below and in the accompanying memorandum, which would allow a decision on or before December 1, 2025—minimizing disruption to the primary schedule announced by the State Board of Elections and consistent with the Court's October 30, 2025 Order expressing its intent to resolve all claims expeditiously. Doc. 179.

Event	**Deadline**
PI Motions	October 31, 2025
Briefs in Response to PI Motions	November 14, 2025
Reply Briefs	November 18, 2025 at 10:00 a.m.
Preliminary Injunction Hearing	November 19, 2025, or as soon as the Court can accommodate

Alternatively, Plaintiffs submit that the Court has authority to adjust the start of the candidate filing period, currently set to begin on December 1, 2025, to allow additional time to resolve the PI Motions. *See, e.g.*, *South Carolina v. United States*, 585 F. Supp. 418 (D.D.C. 1984); *Larios v. Cox*, 305 F. Supp. 2d 1335, 1342–44 (N.D. Ga. 2004). Should the Court choose to exercise that authority, Plaintiffs propose the following adjusted schedule:

Event	Deadline
PI Motions	October 31, 2025
Briefs in Response to PI Motions	November 17, 2025
Reply Briefs	November 24, 2025
Preliminary Injunction Hearing	During the week of December 1, 2025

Plaintiffs conferred with Legislative Defendants and the State Board of Elections ("SBOE") on October 30 and 31, 2025. Legislative Defendants indicated they will state their position in their forthcoming filing responding to the Court's October 30, 2025 Order. The SBOE did not state a position regarding Plaintiffs' request and will assess the feasibility of adjusting the start of the candidate filing period.

WHEREFORE, Plaintiffs respectfully request that the Court:

1. Grant this Motion to Expedite;
2. Adopt the expedited briefing schedule proposed in Plaintiffs' accompanying memorandum; and
3. Grant such other and further relief as the Court deems just and proper.

Dated: October 31, 2025

Respectfully Submitted,

/s/ Lalitha D. Madduri

/s/ Hilary Harris Klein

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CERTIFICATE OF SERVICE

I certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Olivia Molodanof
Olivia Molodanof

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al., *Plaintiffs,* v. REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al., *Defendants*.	Civil Action No. 23 CV 1057
NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al., *Plaintiffs,* v. PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al., *Defendants.*	Civil Action No. 23 CV 1104

PLAINTIFFS' MEMORANDUM IN SUPPORT OF JOINT MOTION FOR EXPEDITED BRIEFING SCHEDULE, HEARING DATE, AND DECISION ON MOTIONS FOR PRELIMINARY INJUNCTION

Pursuant to Local Rule 7.3(f), Williams Plaintiffs and NAACP Plaintiffs (collectively, "Plaintiffs") respectfully request expedited briefing and consideration of NAACP Plaintiffs' Motion for Preliminary Injunction (Doc. 182) and Williams Plaintiffs' forthcoming Motion for Preliminary Injunction (together, the "PI Motions"). In support of their request, Plaintiffs state as follows:

1. On October 30, 2025, the Court granted Plaintiffs' respective motions for leave to file supplemental complaints challenging the Legislative Defendants' newly enacted U.S. Congressional map—Senate Bill 249 (S.L. 2025-95) ("S.B. 249"). Doc. 179.

2. Plaintiffs filed their respective supplemental complaints on October 30 and October 31, 2025, in accordance with the Court's Order. *See* Docs. 180 and 181. Among other relief, Plaintiffs seek to preliminarily and permanently enjoin Defendants from calling, holding, supervising, or certifying any elections conducted under S.B. 249. *See* Doc. 180 at 45; Doc. 181 at 45-46.

3. The NAACP Plaintiffs filed their PI Motion earlier today, October 31, and the Williams Plaintiffs will file their PI Motion shortly after this Motion to Expedite. As explained in those Motions, Plaintiffs will suffer irreparable harm to their constitutional and statutory rights if S.B. 249 is permitted to take effect for the 2026 election cycle. Plaintiffs thus seek to preliminarily enjoin the statute's operation before that cycle begins and pending resolution of this action.

4. Because the 2026 election cycle is set to begin in just over four weeks, there is good cause for the Court to expedite consideration of the PI Motions. The candidate filing period for the 2026 cycle opens on December 1, 2025, and the State Board of

Elections ("SBOE") has indicated that it must receive any new congressional map by that date to avoid delaying ballot preparation and distribution for the March 2026 primary. Doc. 171 at 2. Meeting the SBOE's timeline will require resolution of the PI Motions on a timeline shorter than the default under the Local Rules. *See* L.R. 7.3(f), (h) (setting 21-day and 14-day deadlines for motion responses and replies, respectively, but allowing a shorter schedule for good cause). Plaintiffs therefore propose the following expedited briefing schedule, which will facilitate a decision on the PI Motions on or before December 1, as appropriate to minimize delays to the candidate filing period, avoid the need for Court ordered adjustments to the primary schedule, and align with the Court's October 30, 2025 Order expressing an intent to resolve Plaintiffs' claims as expeditiously as possible (Doc. 179):

Event	**Deadline**
PI Motions	October 31, 2025
Briefs in Response to PI Motions	November 14, 2025
Reply Briefs	November 18, 2025 at 10:00 a.m.
Preliminary Injunction Hearing[1]	November 19, 2025, or as soon as the Court can accommodate

5. Plaintiffs conferred with Defendants regarding the proposed schedule on October 30, 2025. Plaintiffs offered for the hearing to be conducted remotely for the

[1] NAACP Plaintiffs' expert, Kassra Oskooii, will be unavailable due to international travel from November 17 through 27, 2025. In any event, if it will assist the Court in timely resolution of the PI Motions, NAACP Plaintiffs are willing to limit the hearing to oral argument, without an evidentiary hearing.

Williams Plaintiffs' experts are available at the Court's convenience if it would be helpful to the Court to hear remote or live testimony related to their motion for preliminary injunction. Williams Plaintiffs defer to the Court on if an evidentiary hearing would aid the Court but are likewise willing to limit the hearing to oral argument.

convenience of the Court and to facilitate a decision on the PI Motions before December 1. Legislative Defendants object to a remote hearing. Plaintiffs anticipate that the hearing will require one to two days, depending on how many witnesses are called to testify.

6. Alternatively, Plaintiffs jointly submit that the Court has authority to extend the start of the candidate filing period, currently set to begin on December 1, 2025, to allow additional time to resolve the PI Motions. *See, e.g.*, *South Carolina v. United States*, 585 F. Supp. 418 (D.D.C. 1984) (candidate filing period was enjoined where it was unclear whether reapportionment plan could be lawfully used in upcoming election); *Larios v. Cox*, 305 F. Supp. 2d 1335, 1342-44 (N.D. Ga. 2004) ("the court has broad equitable power to delay certain aspects of the electoral process if necessary"). Should the Court choose to exercise that authority because a resolution of the PI Motions cannot be accomplished by December 1, 2025, Plaintiffs propose that the candidate filing period be adjusted and that the following alternative briefing schedule be adopted:

Event	**Deadline**
PI Motions	October 31, 2025
Briefs in Response to PI Motions	November 17, 2025
Reply Briefs	November 24, 2025
Preliminary Injunction Hearing	During the week of December 1, 2025

7. Plaintiffs met and conferred with Legislative Defendants and Defendant SBOE again on October 31, 2025. Plaintiffs agreed to Legislative Defendants' proposed deadline for responsive briefing on the PI Motion under the expedited schedule that does not require altering the candidate filing period. Legislative Defendants indicated that they

will state their position on Plaintiffs' request to expedite briefing in their filing due Monday, November 3, in response to the Court's October 30 Order. Defendant SBOE did not state a position regarding Plaintiffs' request and will assess the feasibility of adjusting the December 1 start of the candidate filing period.

* * *

For the reasons above, Plaintiffs respectfully request that the Court grant this Motion and permit the expedited schedule as set forth above.

Dated: October 31, 2025

/s/ Lalitha D. Madduri

Respectfully Submitted,

/s/ Hilary Harris Klein

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.3(d), I hereby certify that this brief contains 1,009 words as counted by the word count feature of Microsoft Word.

/s/ *Hilary Harris Klein*
Hilary Harris Klein

CERTIFICATE OF SERVICE

I certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Olivia Molodanof
Olivia Molodanof

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FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, et al., *Plaintiffs*, v. REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al., *Defendants*.	1:23CV1057
NORTH CAROLINA STATE CONFERENCE OF THE NAACP, et al., *Plaintiffs*, v. PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al., *Defendants.*	1:23CV1104

[PROPOSED] ORDER

This matter is before the Court upon NAACP Plaintiffs' and Williams Plaintiffs' Joint Motion for Expedited Briefing Schedule, Hearing Date, and Decision on NAACP Plaintiffs' Motion for Preliminary Injunction (Doc. 182) and Williams Plaintiffs' Motion for Preliminary Injunction (Doc.__). After consideration of the Joint Motion, and for good cause shown, the Court hereby GRANTS the Motion, and modifies the briefing schedule as follows:

- Defendants' responses due [November 14 / November 17], 2025.
- Plaintiffs' replies due [November 18 at 10 a.m. / November 24], 2025.

The Court sets a hearing date on the Motion for _____, 2025 at _____ a.m.

IT IS SO ORDERED on this, the _____ day of October, 2025.

_____

UNITED STATES DISTRICT JUDGE