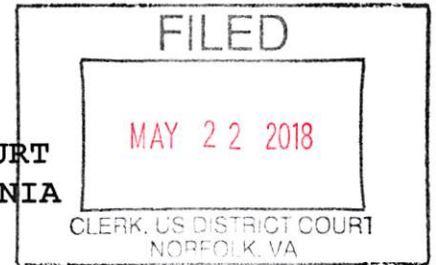


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



LATASHA HOLLOWAY,

plaintiff,

vs.

ACTION NO. 2:18-cv-69 AWA-RJK

CITY OF VIRGINIA BEACH, VIRGINIA,

defendants.

MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO DEFENDANT

I am the plaintiff in this case and am currently not represented by counsel. I believe that I am unable to proceed with my vote dilution claims in this case without the assistance of counsel.

(1) On November 20, 2017, I filed a complex vote dilution and discrimination complaint against the Virginia Beach City Council, alleging that the City's at-large system dilutes or minimizes "minority voting strength" and deprives African-Americans and others similarly situated an equal opportunity to elect candidates of their choice in violation of Section 2 of the Voting Rights Act of 1965, as amended 42 U.S.C.

§1973 et. seq., 42 U.S.C. §1983, the First, Fourteenth and the Fifteenth Amendments to the United States Constitution through adoption in the 1906-1962 city charter of the at-large elections scheme as a means to promote racially discriminatory objectives.

(2) the plaintiff has diligently made a reasonable good faith effort to secure legal representation from the Lawyers Committee for Civil Rights Under Law, and other private attorneys without success;

(3) Plaintiff needs additional time to retain legal counsel to represent her in the above-referenced matter.


(4) Plaintiff suffers from cognitive impairment and cares for her special needs children and a parent which suffers from intellectual disability and depression, that hinders her ability to focus and prosecute case.

I am aware that I am obligated, as a party in this case representing myself, to meet all obligations and deadlines imposed under the law and follow the rules of procedure, local rules, and the practice of standards of this court.

(5) Plaintiff believes she will likely succeed on the merits of the case if granted additional time to respond for good cause shown and as a matter of Law.

(6) Plaintiff and defendants will not be prejudiced by granting motion.

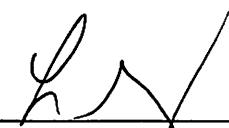
I ASK FOR THIS



Ms. Latasha Holloway
3683 Windmill Drive
Virginia Beach, Virginia 23453
(757)348-0456

CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2018, a true copy of the foregoing was mailed to Mark D. Stiles Counsel for defendants, City Attorney Office of the City Attorney 2401 Courthouse Dr Building 1 Virginia Beach, Virginia 23456. (757)385-5687 mstiles@vb.gov.com



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