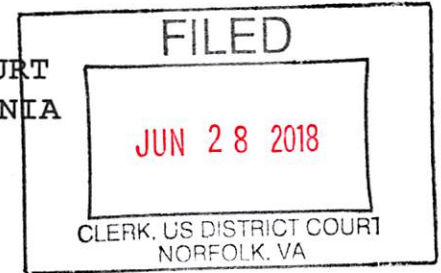


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION



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 June 11, 2018, I filed an amended complaint against the Virginia Beach City Council, LOUIS JONES, Mayor, JAMES WOOD, JESSICA ABBOTT, BEN DAVENPORT, ROBERT DYER, BARBARA HENLEY, SHANNON KANE, JOHN MOSS, JOHN UHRIN, and ROSEMARY WILSON, members of the Virginia Beach City Council; CITY OF VIRGINIA BEACH ELECTORIAL BOARD; DONNA A PATTERSON, DEAN "AL" ABLOWICH, LAURALEE GRIM, TIM BARROW, members of the

CITY OF VIRGINIA BEACH ELECTORAL BOARD, for declaratory and injunctive relief challenging the City's at-large, citywide elections for the members of the Virginia Beach City Council for unlawful dilution of African American voting strength.

(2) the plaintiff has diligently made a reasonable good faith effort to secure legal representation from other private attorneys in the City without success;

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

(4) Plaintiff continues to suffer 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.

(5) Defendant has file both a reply to Plaintiff's reply opposition to its motion dismiss and plaintiff's amended complaint, that fail to sufficiently present any evidence disproving or even addressing Plaintiff's

claim the City's use of at-large elections operates to minimize or cancel out their ability to elect their preferred candidates.

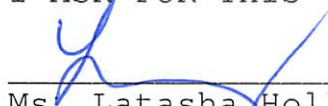
(6) I am aware that I am obligated, as a party in this case representing myself, to meet all obligations and deadlines imposed under the law and follow the rules of procedure, local rules, and the practice of standards of this court.

(7) 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.

(8) The Court has not ruled on Plaintiff's amended complaint as of this filing.

(9) 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 June 27, 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@vbgov.com



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