

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

SHELBY COUNTY, ALABAMA

Plaintiff,

v.

ERIC H. HOLDER, JR.,
in his official capacity as
ATTORNEY GENERAL OF THE
UNITED STATES,

Defendant.

EARL CUNNINGHAM, BOBBY PIERSON,
BOBBY LEE HARRIS, *et al.*,

Defendant-Intervenors.

Civil Action No. 1:10-cv-00651-JDB

**PLAINTIFF'S RESPONSE TO ATTORNEY GENERAL'S NOTICE
OF SUPPLEMENTAL INFORMATION**

Plaintiff Shelby County ("Plaintiff") respectfully submits this response to Defendant Attorney General's Notice of Supplemental Information ("Notice") concerning bailout actions that have been consented to by the Attorney General since February 2, 2011. Plaintiff has no procedural objection to the submission of the Notice. However, Plaintiff maintains that the bailout actions referenced therein, as well as any other potential bailouts that the Attorney General may be investigating, *see* Notice at 1-2, are irrelevant to this litigation for reasons previously explained to this Court, *see* Pl.'s Consolidated Reply Mem. in Support of its Mot. for Summ. J. and in Opp. to Def.'s and Def.-Intervenors' Cross-Mot. for Summ. J. at 33 n.8, 53 n.18 (Dkt. No. 65); Pl.'s Supp. Mem. in Support of its Mot. For Summ. J. and in Opp. to Def.'s and Def.-Intervenors' Cross-Mot. for Summ. J. at 2-3 (Dkt. No. 74).

Dated: June 16, 2011

Respectfully submitted,

/s/ William S. Consovoy

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