

Nos. 16-1270 and 16-1271

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

RALEIGH WAKE CITIZENS ASSOCIATION; JANNET B. BARNES;
BEVERLEY S. CLARK; WILLIAM B. CLIFFORD; BRIAN FITZSIMMONS;
GREG FLYNN; DUSTIN MATTHEW INGALLS; AMY T. LEE; ERVIN
PORTMAN; SUSAN PORTMAN; JANE C. ROGERS; BARBARA D.
VANDENBERGH; JOHN G. VANDENBERGH; AMY WOMBLE;
PERRY WOODS,

Plaintiffs-Appellants,

v.

WAKE COUNTY BOARD OF ELECTIONS,

Defendant-Appellee.

CALLA WRIGHT; WILLIE J. BETHEL; AMY T. LEE; AMYGAYLE L.
WOMBLE; BARBARA VANDENBERGH; JOHN G. VANDENBERGH;
AJAMU G. DILLAHUNT; ELAINE E. DILLAHUNT; LUCINDA H.
MACKETHAN; WILLIAM B. CLIFFORD; ANN LONG CAMPBELL; GREG
FLYNN; BEVERLEY S. CLARK; CONCERNED CITIZENS FOR AFRICAN-
AMERICAN CHILDREN, d/b/a Coalition of Concerned Citizens for
African-American Children; RALEIGH WAKE CITIZENS ASSOCIATION,

Plaintiffs-Appellants,

v.

STATE OF NORTH CAROLINA; WAKE COUNTY BOARD OF ELECTIONS,

Defendants-Appellees.

On Appeal from the United States District Court
for the Eastern District of North Carolina

**RESPONSE TO INQUIRY
REGARDING CONSOLIDATION OF APPEALS**

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RESPONSE

Appellee-Defendant Wake County Board of Elections, by and through undersigned counsel, hereby responds to the Court's March 16, 2016 inquiry regarding consolidation of the appeals in the above-captioned captioned cases. The Wake County Board of Elections believes these cases are appropriate for consolidation in this Court. The cases were consolidated for trial, which led to efficient proceedings before the District Court, and the District Court issued a single order deciding both cases. Consolidating the cases in this Court will produce similar efficiencies in the presentation and defense of this appeal and will further judicial

economy. Accordingly, the Wake County Board of Elections respectfully requests that this Court consolidate the two cases.

Respectfully submitted this 28th day of March, 2016.

/s/ Charles F. Marshall

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CERTIFICATE OF SERVICE

I hereby certify that, on the date below, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

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Respectfully submitted this 28th day of March, 2016.

/s/ Matthew B. Tynan

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