

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

LATASHA HOLLOWAY, *et al.*,

Plaintiffs,

v.

CITY OF VIRGINIA BEACH, *et al.*,

Defendants.

**PLAINTIFFS' RESPONSE TO
DEFENDANTS' NOTICE OF
SUPPLEMENTAL AUTHORITY**

Civil Action No. 2:18-cv-0069

Plaintiffs file this response to Defendants' Notice of Supplemental Authority, ECF 330, to note that denial of the City's joinder motion in the *Branch* litigation does not change the ample grounds supporting Plaintiffs' Rule 60(b) Motion, as outlined in Plaintiffs' Motion and Reply in Support. ECF 322, 329. Contrary to Defendants' assertions, ECF 330 at 1, Plaintiffs' Rule 60(b) Motion did not rest solely on the City's attempts to force Plaintiffs to adjudicate their federal claims as involuntary defendants in a state court forum. Rather, the status of the City's charter, the City's actions retreating from its commitment to the 10-1 system, and the extensive record and evidence already developed in this litigation regarding the dilutive nature of at-large elections in Virginia Beach justify relief. As a result, this Court should vacate its dismissal and reopen this case pursuant to Federal Rule of Civil Procedure 60(b)(5) and/or (6).

Dated: June 3, 2025

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Respectfully submitted,
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of June 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing to the following:

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