

**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' MOTION FOR LOCAL
COUNSEL TO APPEAR REMOTELY**

Civil Action No. 2:18-cv-0069

Plaintiffs respectfully request leave for Plaintiffs' local counsel for the Eastern District of Virginia, Shanna Ports, to appear remotely at the hearing on Plaintiffs' Rule 60(b) Motion for Relief from Judgment. When the Court initially requested counsel's availability on June 12, 13, and 16, Plaintiffs noted their availability on June 12 and 13 but noted that they would be unavailable for a hearing on June 16. Ex. 1 at 1. However, after Defendants indicated that they were solely available on June 16, Plaintiffs' counsel advised that they could be available for a hearing on June 16, but only "[i]f counsel for Plaintiffs can appear at this hearing without our EDVA local counsel." Ex. 2 at 2. The Court subsequently scheduled the hearing for 11:30 am on June 16. Plaintiffs' counsel has since confirmed with the Courtroom Deputy that the hearing will be held in person and that the Court has not waived the requirement for local counsel to participate.

Plaintiffs seek leave for Ms. Ports to appear remotely as she is conducting a Senate briefing on June 16 beginning at 1:00 pm which, consistent with Plaintiffs' prior communications to the Court, prevents her from being physically present at the courthouse and which will require her to end remote participation at 12:45 pm. Other counsel for Plaintiffs will be present in person and will participate in the entirety of the proceedings regardless of their duration. In the alternative,

Plaintiffs ask that the Court waive the requirement for local counsel to be present for this proceeding or reschedule the hearing for any time on June 17 or 18.¹

Dated: June 3, 2025

Respectfully submitted,

Annabelle E. Harless*
Campaign Legal Center
55 W. Monroe St., Ste. 1925
Chicago, IL 60603
aharless@campaignlegalcenter.org

/s/ Shanna Ports
Shanna Ports
VSB. No. 86094
Mark P. Gaber*
Simone Leeper*
Campaign Legal Center
1101 14th Street NW, Suite 400
Washington, DC 20005
T: (202) 736-2200
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sports@campaignlegalcenter.org
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sleeper@campaignlegalcenter.org

**Admitted pro hac vice*

*Attorneys for Plaintiffs Latasha Holloway
and Georgia Allen*

¹ Ms. Ports, who does not reside in Norfolk, is currently pregnant and has been instructed by her physician not to travel after June 20. Ms. Leeper, who will be advocating on behalf of the Plaintiffs at this hearing, is on personal leave June 19 and 20.

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:

Mark D. Stiles (VSB No. 30683)
Christopher S. Boynton (VSB No. 38501)
Gerald L. Harris (VSB No. 80446)
Joseph M. Kurt (VSB No. 90854)
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plewis@bakerlaw.com

*/s/ Shanna Ports
Counsel for Plaintiffs*

EXHIBIT 1

6/16/25 at 11:30am or 2:30pm

10561

Please let me know at your earliest convenience. I look forward to hearing from you soon.

Thank you,

Iesha Shaw
Courtroom Deputy to the
Honorable Raymond A. Jackson, USDJ
United States District Court
600 Granby Street
Norfolk, VA 23510
757-222-7219
iesha_shaw@vaed.uscourts.gov

EXHIBIT 2



Re: 2:18cv69 - Holloway v. City of Virginia Beach, Virginia

From Christopher S. Boynton <CBoynton@vbgov.com>

Date Fri 5/30/2025 4:44 PM

To Ilesha Shaw <Ilesha_Shaw@vaed.uscourts.gov>; Simone Leeper <SLeeper@campaignlegalcenter.org>; Shanna Ports <sports@campaignlegalcenter.org>; Annabelle Harless <aharless@campaignlegalcenter.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; Joseph M. Kurt <jKurt@vbgov.com>; kmcknight@bakerlaw.com <kmcknight@bakerlaw.com>; rraile@bakerlaw.com <rraile@bakerlaw.com>; Mark Stiles <MStiles@vbgov.com>; Christopher J. Turpin <CTurpin@vbgov.com>; plewis_bakerlaw.com <plewis@bakerlaw.com>; Prouty, Erika Dackin <eprouthy@bakerlaw.com>

Thank you Ms. Shaw.

Sent via Outlook for iOS

From: Ilesha Shaw <Ilesha_Shaw@vaed.uscourts.gov>

Sent: Friday, May 30, 2025 4:39:39 PM

To: Simone Leeper <SLeeper@campaignlegalcenter.org>; Christopher S. Boynton <CBoynton@vbgov.com>; Shanna Ports <sports@campaignlegalcenter.org>; Annabelle Harless <aharless@campaignlegalcenter.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; Joseph M. Kurt <jKurt@vbgov.com>; kmcknight@bakerlaw.com <kmcknight@bakerlaw.com>; rraile@bakerlaw.com <rraile@bakerlaw.com>; Mark Stiles <MStiles@vbgov.com>; Christopher J. Turpin <CTurpin@vbgov.com>; plewis_bakerlaw.com <plewis@bakerlaw.com>; Prouty, Erika Dackin <eprouthy@bakerlaw.com>

Subject: RE: 2:18cv69 - Holloway v. City of Virginia Beach, Virginia

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Good afternoon,

The hearing has been scheduled for 6/16/25 at 11:30am.

Thank you,

Ilesha Shaw
Courtroom Deputy to the
Honorable Raymond A. Jackson, USDJ
United States District Court
600 Granby Street
Norfolk, VA 23510
757-222-7219
iesha_shaw@vaed.uscourts.gov

From: Simone Leeper <SLeeper@campaignlegalcenter.org>

Sent: Friday, May 30, 2025 10:51 AM

To: Christopher S. Boynton <CBoynton@vbgov.com>; Ilesha Shaw <Ilesha_Shaw@vaed.uscourts.gov>; Shanna Ports

<sports@campaignlegalcenter.org>; Annabelle Harless <aharless@campaignlegalcenter.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; Joseph M. Kurt <jKurt@vbgov.com>; kmcknight@bakerlaw.com; rraile@bakerlaw.com; Mark Stiles <MStiles@vbgov.com>; Christopher J. Turpin <CTurpin@vbgov.com>; plewis_bakerlaw.com <plewis@bakerlaw.com>; Prouty, Erika Dackin <eprouty@bakerlaw.com>

Subject: Re: 2:18cv69 - Holloway v. City of Virginia Beach, Virginia

CAUTION - EXTERNAL:

Deputy Shaw,

If counsel for Plaintiffs can appear at this hearing without our EDVA local counsel, the offered 6/16 times work for us as well.

Best,

Simone Leeper (she/her)

Senior Legal Counsel, Redistricting

727.418.8011

Campaign Legal Center
1101 14th St. NW, Suite 400
Washington, DC 20005
campaignlegalcenter.org

From: Christopher S. Boynton <CBoynton@vbgov.com>
Sent: Friday, May 30, 2025 10:37 AM
To: Iesha Shaw <lesha_shaw@vaed.uscourts.gov>; Shanna Ports <sports@campaignlegalcenter.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; Simone Leeper <SLeeper@campaignlegalcenter.org>; Joseph M. Kurt <jKurt@vbgov.com>; kmcknight@bakerlaw.com <kmcknight@bakerlaw.com>; rraile@bakerlaw.com <rraile@bakerlaw.com>; Mark Stiles <MStiles@vbgov.com>; Christopher J. Turpin <CTurpin@vbgov.com>; Lewis, Patrick T. <plewis@bakerlaw.com>; Prouty, Erika Dackin <eprouty@bakerlaw.com>
Subject: RE: 2:18cv69 - Holloway v. City of Virginia Beach, Virginia

Ms. Shaw, the Defendants' only availability of the dates provided is on June 16th at either 11:30 or 2:30. Thank you.

Chris Boynton

Christopher S. Boynton

Deputy City Attorney

757-385-5061 | cboynton@vbgov.com

OFFICE OF THE CITY ATTORNEY

Municipal Center Building One, Suite 2098

2401 Courthouse Dr. | Virginia Beach, VA 23456



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From: Ilesha Shaw <Ilesha_Shaw@vaed.uscourts.gov>

Sent: Thursday, May 29, 2025 5:23 PM

To: sports@campaignlegalcenter.org; mgaber@campaignlegalcenter.org; sleeper@campaignlegalcenter.org; jharris@hangerlaw.com; Christopher S. Boynton <CBoynton@vbgov.com>; Joseph M. Kurt <jKurt@vbgov.com>; kmcknight@bakerlaw.com; rraile@bakerlaw.com

Subject: 2:18cv69 - Holloway v. City of Virginia Beach, Virginia

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Good afternoon,

The Court has directed me to schedule a hearing with all parties for ECF #322 – Motion Rule 60(b) Relief from Judgment. Please let me know which of the following dates work with your calendars:

6/12/25 at 11:30am or 2:30pm

6/13/25 at 11:30am or 2:30pm

6/16/25 at 11:30am or 2:30pm

Please let me know at your earliest convenience. I look forward to hearing from you soon.

Thank you,

Iesha Shaw

Courtroom Deputy to the

Honorable Raymond A. Jackson, USDJ

United States District Court

600 Granby Street

Norfolk, VA 23510

757-222-7219

iesha_shaw@vaed.uscourts.gov

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