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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

The State of Arizona; and
Michele Reagan, Secretary of
State of Arizona, in her
official capacity,

Defendants.

Case No.:

JOINT MOTION REQUESTING
EXPEDITED ENTRY OF
CONSENT DECREE

Plaintiff United States of America and Defendants, through their undersigned counsel, respectfully move this Court to enter the accompanying Consent Decree. The Complaint in this action is being filed simultaneously with this motion.

1 The United States and Defendants have negotiated in good faith and have agreed to
2 entry of the proposed Consent Decree as a necessary and appropriate form of relief to
3 provide UOCAVA voters a fair and reasonable opportunity to participate in the 2018
4 special primary and general election to fill a vacated seat in Arizona's Eighth
5 Congressional District, and in future special federal elections. The parties share the goal
6 of providing UOCAVA voters with the opportunity guaranteed by Federal law to
7 participate in the 2018 special election cycle, as well as future special elections for Federal
8 office. Given the imminence of the upcoming special election, and the time-sensitive
9 provisions for notice to UOCAVA voters contained in the Decree, the parties request the
10 Court's expedited consideration of this Joint Motion.

11 WHEREFORE, the parties move that the accompanying Consent Decree be entered
12 by this Court.

13 AGREED AND CONSENTED TO, February 14, 2018.
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1 For the Plaintiff United States of America:

2 JOHN M. GORE
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5 /s/ David G. Cooper

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Date: February 14, 2018

1 For the Defendants State of Arizona, *et al.*:

2 MARK BRNOVICH
3 Attorney General of Arizona

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5 /s/ Joseph E. La Rue
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Date: February 14, 2018

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