

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC
PARTICIPATION, MARY WINTER, GENE
STEINBERG, NANCY HART, SARAH
WOLFF, KAREN SLAVEN, KATE KENNEDY,
EDA DANIEL, and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its
attorney general, LETITIA JAMES, ATTORNEY
GENERAL OF THE STATE OF NEW YORK,

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LLC, PROJECT
1599, and JOHN and JANE DOES 1-10,

Defendants.

Oral Argument Requested

Civil Action No. 20-cv-8668

**NOTICE OF MOTION FOR PLAINTIFFS' JOINT MOTION FOR SUMMARY
JUDGMENT AS TO LIABILITY ON ALL CLAIMS**

For the reasons set forth in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Joint Motion for Summary Judgment as to Liability on All Claims, Plaintiffs' Statement of Undisputed Material Facts Pursuant to Local Civil Rule 56.1, the Declaration of Franklin Monsour Jr. and the Exhibits attached thereto, the Declaration of Rick Sawyer, and the Affidavit of Douglas Kellner, Plaintiffs National Coalition on Black Civic Participation Mary Winter, Gene Steinberg, Nancy Hart, Sarah Wolff, Karen Slaven, Kate Kennedy, Eda Daniel, and Andrea Sferes, and Plaintiff-Intervenor People of the State of New York respectfully request that the Court grant Plaintiffs'

Joint Motion for Summary Judgment as to Liability on All Claims pursuant to Federal Rule of Civil Procedure 56.

Dated: New York, New York
July 29, 2022

Respectfully submitted,

LETITIA JAMES
Attorney General
State of New York

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By: /s/ Rick Sawyer
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