

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

TENNESSEE CONFERENCE of the NATIONAL  
ASSOCIATION for the ADVANCEMENT of  
COLORED PEOPLE, et al.,

Plaintiffs,

v.

WILLIAM LEE, in his official capacity as Governor of  
the State of Tennessee, et al.,

Defendants.

Civil No. 3:20-cv-01039

JUDGE CAMPBELL  
MAGISTRATE JUDGE  
FRENSLEY

[Class Action]

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT ON COUNTS 4 AND 6  
OF THE FIRST AMENDED COMPLAINT FOR DECLARATORY  
AND INJUNCTIVE RELIEF**

Pursuant to Fed. R. Civ. P. 56, Plaintiff Tennessee Conference of the National Association for the Advancement of Colored People (“Plaintiff or TN NAACP”) files this Motion for Summary Judgment (“Motion”) on Counts Four and Six of the First Amended Complaint for Declaratory and Injunctive Relief, which pertain to Defendants Goins’ and Hargett’s (“Defendants”) violations of the National Voter Registration Act (“NVRA”), 52 U.S.C. § 20501, *et seq.* Plaintiff contemporaneously files a Memorandum of Law and Statement of Undisputed Material Facts in support of its Motion.

In violation of the NVRA, Defendants’ policies (1) fail to specify eligibility requirements on the voter registration form, (2) unlawfully instruct election officials to reject all voter registration applications on which the applicant indicates they have a prior felony conviction,

regardless of whether the applicant is disqualified from voting, and (3) force eligible applicants to provide documentary proof of their eligibility.

There are no genuine disputes of material fact and Plaintiff is entitled to judgment as a matter of law. For the reasons described in the memorandum, Plaintiff respectfully asks the Court to grant the motion for summary judgment.

Respectfully submitted,

/s/ Charles K. Grant

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on August 2, 2023, via the Court's electronic filing system to the following:

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