

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

NAACP VIRGINIA STATE
CONFERENCE,

Plaintiff,

v.

JOHN O'BANNON, in his official capacity as
a member of the Virginia State Board of
Elections, et al.,

Defendants.

Case No. 1:25-cv-01937

JOINT MOTION FOR ENTRY OF CONSENT DECREE

Plaintiff NAACP Virginia State Conference (“NAACP”) and Defendants John O’Bannon, Rosalyn R. Dance, Georgia Alvis-Long, Christopher Stolle, J. Chapman Petersen in their official capacities as members of the Virginia State Board of Elections and Steve Koski, in his official capacity as Virginia Commissioner of Elections (collectively “State Defendants”), by and through their counsel, hereby move the Court to enter the attached Consent Decree, Ex. 1, as part of an agreed upon settlement between the parties regarding the merits of this case. On May 28, 2026, the State Board of Elections voted to authorize the signing of the attached consent decree.

The entry of the Consent Decree would vindicate the public interest by ensuring that Virginia college and university students do not face barriers to registration solely because they do not provide a college dormitory/residence hall room number, campus mailing address, and/or campus mail box number on their voter registration application.

The parties have conferred with counsel for Local Defendants to seek their position on this motion.¹ Local Defendants take no position on this motion.

The entry of the Consent Order resolves all of Plaintiffs' claims against State Defendants, including those brought under the United States Constitution, the Civil Rights Act of 1964, and 42 U.S.C. § 1983 relating to the above-captioned matter, as well as any claims for injunctive relief. This leaves only the issue of Plaintiffs' claims for attorneys' fees and the costs and expenses of litigation to be resolved.

Dated: May 29, 2026

Respectfully submitted,

By: /s/ Murad S. Hussain

Ian S. Hoffman (VSB 75002)

Murad S. Hussain (VSB 96830)

John A. Freedman*

Jeremy Karpatkin*

L. Charles Landgraf*

Samuel D. Kleinman*

ARNOLD & PORTER KAYE SCHOLER LLP

601 Massachusetts Ave., NW.

Washington, DC 20001

(202) 942-5000

murad.hussain@arnoldporter.com

ian.hoffman@arnoldporter.com

john.freedman@arnoldporter.com

jeremy.karpatkin@arnoldporter.com

charles.landgraf@arnoldporter.com

sam.kleinman@arnoldporter.com

By: /s/ John Powers

John Powers*

Hani Mirza*

ADVANCEMENT PROJECT

1220 L Street Northwest, Suite 850

Washington, D.C. 20005

(202) 728-9557

¹ Local Defendants consist of the members of the electoral boards and the general registrars of Chesterfield County, the City of Richmond, the City of Harrisonburg, and the City of Norfolk. See Dkt. 114 at 1. Plaintiff anticipates dismissing all of its claims against Local Defendants pursuant to Rule 41 once the Court enters the attached Consent Decree.

jpowers@advancementproject.org
hmirza@advancementproject.org

*Admitted *pro hac vice*

*Counsel for Plaintiff NAACP Virginia State
Conference*

By: /s/ Tillman J. Breckenridge

Jay Jones

Attorney General

Tillman J. Breckenridge (VSB 84657)

Solicitor General

Daniel J. Honold (VSB 102490)

Deputy Solicitor General

Triston Chase O'Savio (VSB 100111)

Assistant Solicitor General

Office of the Attorney General

202 North Ninth Street

Richmond, Virginia 23219

(804) 786-2071 – Telephone

(804) 786-1991 – Facsimile

SolicitorGeneral@oag.state.va.us

*Counsel for Defendants John O'Bannon,
Rosalyn R. Dance, Georgia Alvis-Long,
Christopher Stolle, J. Chapman Petersen, and
Steve Koski*

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May, 2026, I caused to be filed the foregoing JOINT MOTION FOR ENTRY OF CONSENT DECREE with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Murad S. Hussain
Murad S. Hussain (VSB 96830)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave., NW.
Washington, DC 20001
(202) 942-5000
murad.hussain@arnoldporter.com

*Counsel for Plaintiff NAACP Virginia State
Conference*

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