

STATE OF NORTH CAROLINA ) IN THE GENERAL COURT OF JUSTICE  
COUNTY OF CHATHAM ) SUPERIOR COURT DIVISION  
19 CVS 809

2019 NOV -8 A 11:35

Barbara Clark Pugh; Gene Terrell Brooks;  
Thomas Henry Clegg; The Winnie Davis  
Chapter #259 of the United Daughters  
of the Confederacy, )  
CHATHAM CO., C.S.C.  
BY ) nk

Plaintiffs,

v.

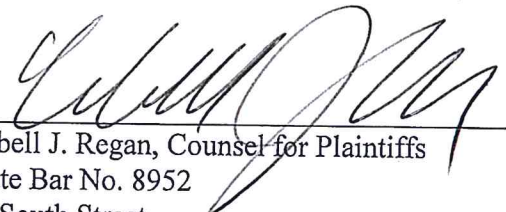
NOTICE OF HEARING

Karen Howard; Mike Dasher; Jim Crawford;  
Andy Wilkie, in their official capacities  
as Members of the Board of County  
Commissioners of Chatham County, North  
Carolina,

Defendants.

Pursuant to Rule 65(b) of the North Carolina Rules of Civil Procedure, please take notice that the undersigned will bring Plaintiffs' Motion to Continue for hearing in Orange County Superior Court, Hillsboro, North Carolina at 9:30 am on November 12, 2019, or as soon thereafter as the Court can hear said Motion during this session of Orange County Superior Court.

This the 5<sup>th</sup> of November, 2019.

  
Cabell J. Regan, Counsel for Plaintiffs  
State Bar No. 8952  
65 South Street  
Pittsboro, NC 27312  
Telephone No. (919) 542-2989  
[cabellreganlaw@gmail.com](mailto:cabellreganlaw@gmail.com)

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served the foregoing document in the above-entitled action upon all party(is) by:

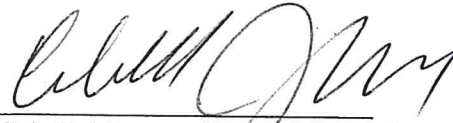
☒ Depositing a copy hereof in a postpaid wrapper in a post office or official depository under the exclusive control and custody of the U.S. Postal Service, properly addressed to said party(is).

☐ Hand Delivery

☐ Fax Transmittal


☐ E-mail

This the 12<sup>th</sup> day of November, 2019.



Cabell J. Regan, Counsel for Plaintiffs  
State Bar No. 8952  
65 South Street  
Pittsboro, NC 27312  
Telephone No. (919) 542-2989  
[cabellreganlaw@gmail.com](mailto:cabellreganlaw@gmail.com)

Address(es):

J. Nicholas Ellis ✓   
Poyner Spruill, LLP  
P. O. Box 353  
Rocky Mount, NC 27802  
FAX: 919-783-1075

Mark Dorosin  
NC State Bar No. 20935  
PO Box 956  
Carrboro, NC 27510  
Tel. 919-914-6106  
[mdorosin@lawyerscommittee.org](mailto:mdorosin@lawyerscommittee.org)

Elizabeth Haddix  
NC State Bar No. 25818  
PO Box 956  
Carrboro, NC 27510  
Tel. 919-914-6106  
[Ehaddix@lawyerscommittee.org](mailto:Ehaddix@lawyerscommittee.org)

Joseph S. Dowdy  
NC State Bar No. 31941  
4208 Six Forks Rd., Suite 1400  
Raleigh, NC 27609  
Phone: (919) 420-1700  
Fax: (919) 420-1800  
[Jdowdy@KilpatrickTownsend.com](mailto:Jdowdy@KilpatrickTownsend.com)

Phillip A. Harris, Jr.  
NC State Bar No. 39740  
4208 Six Forks Rd. Suite 1400  
Raleigh, NC 27609  
Phone: (919) 420-1700  
[Pharris@KilpatrickTownsend.com](mailto:Pharris@KilpatrickTownsend.com)

Elizabeth L. Winters  
NC State Bar No. 44918  
1001 West Fourth Street  
Winston-Salem, NC 27101  
Phone: (336) 607-7300  
Facsimile: (336) 607-7500  
[Bwinters@KilpatrickTownsend.com](mailto:Bwinters@KilpatrickTownsend.com)

2019 NOV - 8 19 CVS 809

BY *nkV.*

Defendants.

a. November 1, 2019, Motion to Dismiss by Defendants;



- b. November 5, 2019, Amended Motion to Dismiss by Defendants;
- c. November 6, 2019, Defendants' Brief in Opposition to Plaintiffs' Motion for Preliminary Injunction;
- d. November 4, 2019, Motion to Intervene by West Chatham Branch of NAACP and Chatham for All;
- e. November 4., 2019, Motion to Dismiss by West Chatham Branch of NAACP and Chatham for All; and
- f. November 5, 2019, Motion for Leave to File Response in Opposition to Plaintiffs' Motion For Preliminary Injunction Or, In alternative, Motion to File Amicus Curiae Brief by West Chatham Branch of NAACP and Chatham for All.

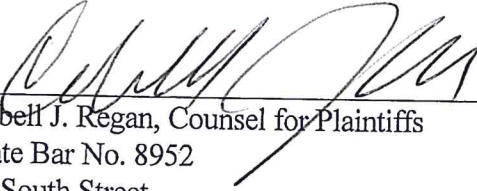
These Defendants and proposed interveners have given notice of hearing for these matters to be heard during the November 11, 2019 term of court. The trial court administrator has placed these matters on the add-on calendar for said session.

- 5. These matters have not been peremptorily set by the Court;
- 6. None of these matters have been continued during the brief pendency of this case;
- 7. Plaintiffs' counsel has not consented to the expeditious scheduling of these matters for the November 11, 2019 term of Superior Court and have notified the Court of conflicts during this term of Court in Wake and Forsyth Counties;
- 8. In light of the exponential volume of pleadings, counsel for Plaintiff has not been able to respond appropriately to each of the opposing parties' pleadings,
- 9. Counsel for Plaintiffs has exercised due diligence promptly filing a motion for continuance as soon as practical;
- 10. Counsel for Plaintiffs request these matters be placed on the first available general civil session in Chatham County following December 1, 2019;
- 11. Counsel for Defendants and the proposed Interveners has pressed to have this matters heard in an unreasonable time, given the pendency of this matter.
- 12. Counsel for Plaintiffs does not foresee any present or future inconvenience or unavailability of witnesses or parties.

Wherefore, Plaintiffs move to continue all the foregoing motions set-on for hearing during to the November 11, 2019 term of the Orange County Superior Court until the first civil session of Superior Court in Chatham County. And to grant unto the Plaintiff whatsoever

further relief this Court deems just and proper.

This the 7<sup>th</sup> day of November, 2019.

A handwritten signature in black ink, appearing to read 'Cabell J. Regan', is written over a horizontal line.

Cabell J. Regan, Counsel for Plaintiffs

State Bar No. 8952

65 South Street

Pittsboro, NC 27312

Telephone No. (919) 542-2989

[cabelljregan@earthlink.net](mailto:cabelljregan@earthlink.net)

CERTIFICATE OF SERVICE

This is to certify that the undersigned has this date served the foregoing document in the above-entitled action upon all party(is) by:

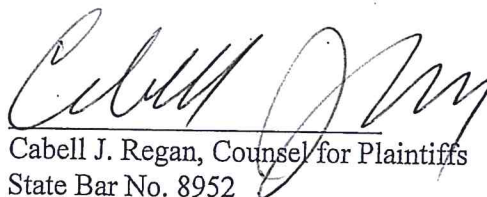
☒ Depositing a copy hereof in a postpaid wrapper in a post office or official depository under the exclusive control and custody of the U.S. Postal Service, properly addressed to said party(is).

☐ Hand Delivery

☐ Fax Transmittal


☐ E-mail

This the 4<sup>th</sup> day of November, 2019.

  
Cabell J. Regan, Counsel for Plaintiffs  
State Bar No. 8952

65 South Street  
Pittsboro, NC 27312  
Telephone No. (919) 542-2989  
[cabellreganlaw@gmail.com](mailto:cabellreganlaw@gmail.com)

Address(es):

J. Nicholas Ellis ✓   
Poyner Spruill, LLP  
P. O. Box 353  
Rocky Mount, NC 27802  
FAX: 919-783-1075

Mark Dorosin  
NC State Bar No. 20935  
PO Box 956  
Carrboro, NC 27510  
Tel. 919-914-6106  
[mdorosin@lawyerscommittee.org](mailto:mdorosin@lawyerscommittee.org)

Elizabeth Haddix  
NC State Bar No. 25818  
PO Box 956  
Carrboro, NC 27510  
Tel. 919-914-6106  
[Ehaddix@lawyerscommittee.org](mailto:Ehaddix@lawyerscommittee.org)

Joseph S. Dowdy  
NC State Bar No. 31941  
4208 Six Forks Rd., Suite 1400  
Raleigh, NC 27609  
Phone: (919) 420-1700  
Fax: (919) 420-1800  
[Jdowdy@KilpatrickTownsend.com](mailto:Jdowdy@KilpatrickTownsend.com)

Phillip A. Harris, Jr.  
NC State Bar No. 39740  
4208 Six Forks Rd. Suite 1400  
Raleigh, NC 27609  
Phone: (919) 420-1700  
[Pharris@KilpatrickTownsend.com](mailto:Pharris@KilpatrickTownsend.com)

Elizabeth L. Winters  
NC State Bar No. 44918  
1001 West Fourth Street  
Winston-Salem, NC 27101  
Phone: (336) 607-7300  
Facsimile: (336) 607-7500  
[Bwinters@KilpatrickTownsend.com](mailto:Bwinters@KilpatrickTownsend.com)