

STATE OF NORTH CAROLINA  
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
21-CVS-015426

NORTH CAROLINA LEAGUE OF  
CONSERVATION VOTERS, INC.;  
HENRY M. MICHAUX, JR.;  
DANDRIELLE LEWIS; TIMOTHY  
CHARTER; TALIA FERNOS;  
KATHERINE NEWHALL; R. JASON  
PARSLEY; EDNA SCOTT; ROBERTA  
SCOTT; YVETTE ROBERTS; YVETTE  
ROBERTS; JEREANN KING JOHNSON;  
REVEREND REGINALD WELLS;  
YARBROUGH WILLIAMS, JR.;  
REVEREND DELORIS L. JERMAN;  
VIOLA RYALS FIGUEROA; and  
COSMOS GEORGE,

Plaintiffs,

vs.

REPRESENTATIVE DESTIN HALL, *in his  
official capacity as Chair of the House  
Standing Committee on Redistricting*;  
SENATOR WARREN DANIEL, *in his  
official capacity as Co-Chair of the Senate  
Standing Committee on Redistricting and  
Elections*; SENATOR RALPH E. HISE, JR.,  
*in his official capacity as Co-Chair of the  
Senate Standing Committee on Redistricting  
and Elections*; SENATOR PAUL  
NEWTON, *in his official capacity as Co-  
Chair of the Senate Standing Committee on  
Redistricting and Elections*;  
REPRESENTATIVE TIMOTHY K.  
MOORE, *in his official capacity as Speaker  
of the North Carolina House of  
Representatives*; SENATOR PHILIP E.  
BERGER, *in his official capacity as  
President Pro Tempore of the North  
Carolina Senate*; THE STATE OF NORTH  
CAROLINA; THE NORTH CAROLINA  
STATE BOARD OF ELECTIONS;  
DAMON CIRCOSTA, *in his official*

*capacity as Chairman of the North Carolina State Board of Elections; STELLA ANDERSON, in her official capacity as Secretary of the North Carolina State Board of Elections; JEFF CARMON III, in his official capacity as Member of the North Carolina State Board of Elections; STACY EGGERS IV, in her official capacity as Member of the North Carolina State Board of Elections; TOMMY TUCKER, in his official capacity as Member of the North Carolina State Board of Elections; and KAREN BRINSON BELL, in her official capacity as Executive Director of the North Carolina State Board of Elections,*

Defendants.

STATE OF NORTH CAROLINA

COUNTY OF WAKE

REBECCA HARPER; AMY CLARE OSEROFF; DONALD RUMPH; JOHN ANTHONY BALLA; RICHARD R. CREWS; LILY NICOLE QUICK; GETTYS COHEN, JR.; SHAWN RUSH; JACKSON THOMAS DUNN, JR.; MARK S. PETERS; KATHLEEN BARNES; VIRGINIA WALTERS BRIEN; DAVID DWIGHT BROWN,

Plaintiffs,

vs.

REPRESENTATIVE DESTIN HALL, *in his official capacity as Chair of the House Standing Committee on Redistricting;* SENATOR WARREN DANIEL, *in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting and Elections;* SENATOR RALPH E. HISE, JR., *in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting and Elections;* SENATOR PAUL

IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
21-CVS-500085

NEWTON, *in his official capacity as Co-Chair of the Senate Standing Committee on Redistricting and Elections*;  
REPRESENTATIVE TIMOTHY K. MOORE, *in his official capacity as Speaker of the North Carolina House of Representatives*; SENATOR PHILIP E. BERGER, *in his official capacity as President Pro Tempore of the North Carolina Senate*; THE STATE OF NORTH CAROLINA; THE NORTH CAROLINA STATE BOARD OF ELECTIONS;  
DAMON CIRCOSTA, *in his official capacity as Chairman of the North Carolina State Board of Elections*; STELLA ANDERSON, *in her official capacity as Secretary of the North Carolina State Board of Elections*; JEFF CARMON III, *in his official capacity as Member of the North Carolina State Board of Elections*; STACY EGGERS IV, *in her official capacity as Member of the North Carolina State Board of Elections*; TOMMY TUCKER, *in his official capacity as Member of the North Carolina State Board of Elections*,

Defendants.

**MOTION FOR LEAVE TO FILE AMICI CURIAE BRIEF OF BIPARTISAN FORMER GOVERNORS MICHAEL F. EASLEY, ARNOLD SCHWARZENEGGER, CHRISTINE TODD WHITMAN AND WILLIAM WELD**

The Honorable Michael F. Easley, the Honorable Arnold Schwarzenegger, the Honorable Christine Todd Whitman and the Honorable William Weld (collectively, the “Former Governors”) respectfully move for leave to file the attached *amici curiae* brief in support of the Plaintiffs in this lawsuit. This motion provides the Former Governors’ interest in this case and discusses why the Court may benefit from hearing their views.

The Former Governors seek permission to participate as *amici curiae* to share their perspective on the issues before the Court. The Former Governors come from both major political

parties in North Carolina, as well as other states. As such, the Former Governors have a substantial, legitimate interest in which North Carolina conducts its redistricting plan, and its effects on governance and democracy in the state.

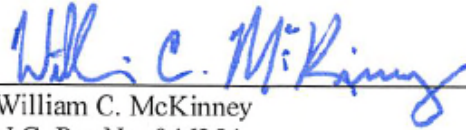
The Former Governors will demonstrate the importance of safeguarding democracy and ensuring a free, fair and secure election process. If the Former Governors are granted leave to participate as *amici curiae*, the Former Governors will demonstrate the far-reaching effects of partisan gerrymandering, which results in a hindrance to democracy, and is contrary to the North Carolina Constitution. Specifically, the *amici curiae* brief highlights the practice of partisan gerrymandering in violation of the North Carolina people's fundamental rights.

This bipartisan group of Former Governors believes that affording the citizens of North Carolina free, fair and secure elections is one of the pillars of our democracy. The Former Governors have seen the effect of partisan gerrymanders on the governance process in a unique position both as the chief executives of their respective states and also as individuals elected by the entire state's population. The Former Governors are compelled to work with their legislative co-equals: to come to terms on legislation, budgets, appointments, and other matters of state. They know how legislative districts that reward partisan polarization make it more challenging to find common ground. The Former Governors are filing this brief to urge the Court to halt the damage that partisan gerrymandering inflicts on our democracy.

Submission of the attached *amici curiae* brief would assist the Court. The matter before the Court is a matter of statewide interest, and one in which multiple viewpoints would benefit the Court. For the foregoing reasons, the Former Governors respectfully request that the Court grant it leave to file the *amici curiae* brief in support of Plaintiffs.

Respectfully submitted, this 31<sup>st</sup> day of December, 2021

**HAYNSWORTH SINKLER BOYD, P.A.**



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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing *Motion for Leave to File Amici Curiae Brief of Bipartisan Former Governors Michael F. Easley, Arnold Schwarzenegger, Christine Todd Whitman, and William Weld* was served upon each of the parties to this action by electronic mail at the e-mail addresses indicated below:

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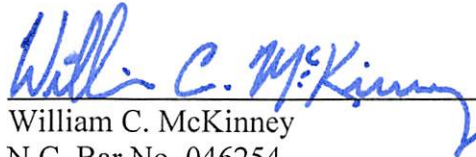
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This the 31<sup>st</sup> day of December, 2021.

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