

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Stephen M. Shapiro, et al.

Plaintiffs,

vs.

David J. McManus, Jr., et al.,

Defendants.

Case No. 13-cv-3233

Three-Judge Court

UNOPPOSED MOTION OF THE CAMPAIGN LEGAL CENTER FOR LEAVE TO FILE
AMICUS CURIAE BRIEF IN SUPPORT OF PLAINTIFFS

The Campaign Legal Center (CLC) respectfully moves this Court for leave to file a brief as *amicus curiae* in support of the Plaintiffs. The proposed brief accompanies this motion.

As grounds for this motion, the CLC will show:

1. The Supreme Court has recognized the grave constitutional harm that political gerrymandering inflicts and it has left the judiciary's doors open to hearing such claims in search of manageable standards.

2. A dismissal of a complaint here would be tantamount to holding a political gerrymandering claim is lacking justiciability.

3. This brief seeks to provide the Court with an understanding of the increasing urgency for the development of a judicially manageable partisan gerrymandering standard, review the recent jurisprudence, and urge this Court to engage in the process of establishing a partisan gerrymandering standard rather than dismiss Plaintiffs' First Amendment claim out of hand.

4. The CLC has a demonstrated interest in voting rights and redistricting law.

5. The CLC is a nonpartisan, nonprofit organization that works in the area of election law, generally, and voting rights law, specifically, generating public policy proposals and participating in state and federal court litigation throughout the nation regarding voting rights.

6. The CLC has substantial experience and expertise in matters relating to this case. It has served as *amicus curiae* or counsel in voting rights and redistricting cases in the Supreme Court, including *Shapiro v. McManus*, 136 S. Ct. 450 (2015); *Arizona State Legislature v. Arizona Independent Redistricting Commission*, 135 S. Ct. 2652 (2015); *Shelby County v. Holder*, 133 S. Ct. 2612 (2013); *Bartlett v. Strickland*, 556 U.S. 1 (2009); and *Crawford v. Marion County Election Board*, 553 U.S. 181 (2008), among others.

7. Counsel for plaintiff has consented to the CLC's participation as *amicus curiae*. Counsel for defendants does not oppose the CLC's filing.

8. This filing is timely because the motion and attached brief are being submitted on the same day as the principal brief of the Plaintiffs.

WHEREFORE, *amicus* movant the CLC respectfully prays that this Court grant leave to file the attached Brief *Amicus Curiae* in support of Plaintiffs' opposition to the motion to dismiss.

May 20, 2016

Respectfully submitted,

/s/ Paul M. Smith
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*Not Admitted to the District Court of the District of Maryland.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 20, 2016, I caused a copy of the foregoing document to be served on all parties by this Court's electronic filing system.

May 20, 2016

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