

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
ARKANSAS  
CENTRAL DIVISION**

**JACKIE WILLIAMS SIMPSON,  
REPRESENTATIVE DENISE ENNETT,  
WANDA KING, CHARLES E. BOLDEN,  
SENATOR LINDA CHESTERFIELD,  
And DR. ANIKA WHITFIELD**

**Plaintiffs,**

**v.**

**JOHN THURSTON, in his official  
capacity as the Arkansas Secretary of  
State, and the STATE OF ARKANSAS,**

**Defendants.**

**CIVIL ACTION**

**Case No: 4:22-cv-213**

**REQUEST FOR  
THREE-JUDGE  
PANEL (28 U.S.C.  
§2284)**

**NOTICE OF APPEAL**

Come the Plaintiffs, Jackie Williams Simpson, Representative Denise Ennett, Wanda King, Charles E. Bolden, Senator Linda Chesterfield, and Dr. Anika Whitfield, by their attorney, Richard H. Mays, pursuant to Rule 18 of the Rules of the Supreme Court of the United States, who hereby give Notice of their Appeal of the Memorandum Opinion and Order entered herein on May 25, 2023; and in furtherance of such Notice, state:

1. The parties taking this appeal are the Plaintiffs, Jackie Williams Simpson, Arkansas State Representative Denise Ennett, Wanda King, Charles E. Bolden, Arkansas State Senator Linda Chesterfield, and Dr. Anika Whitfield.

2. The judgment or Order appealed from and the date of entry of such Order are the Memorandum Opinion and Order of the three-judge panel entered as Document 44 in this case on May 25, 2023.

3. The statute or statutes under which the appeal is taken are: 52 U.S.C.A §10101(g) (Voting Rights); and 28 U.S.C.A. § 1253 (Direct appeals from decisions of three-judge courts). The constitutional provisions and statutes upon which the appeal is based include: The Equal Protection Clause of the 14<sup>th</sup> Amendment to the U.S. Constitution; the 15<sup>th</sup> Amendment to the U.S. Constitution; Section 2(a) of the Voting Rights Act, 52 U.S.C. § 10301(a) et seq.; and Article 2, Section 3 of the Constitution of the State of Arkansas.

Respectfully submitted,

Richard H. Mays  
Ark. Bar No. 61043  
**RICHARD MAYS LAW FIRM PLLC**  
2226 Cottondale Lane – Suite 210  
Little Rock, AR 72202  
Tel: (501) 891-6116  
Email: [rmays@richmayslaw.com](mailto:rmays@richmayslaw.com)  
[njackson@richmayslaw.com](mailto:njackson@richmayslaw.com)

(Richard H. Mays is a member of the Bar of the United States Supreme Court, having been admitted to that Bar on April 28, 1969.)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on the date of the filing of this Notice of Appeal, a copy thereof was served on counsel of record for the Defendant through the Court's ECF electronic service system, and by electronic mail addressed to:

Nicholas J. Bronni, Esq.  
Solicitor General  
Dylan L. Jacobs, Esq.  
Deputy Solicitor General  
**Office of the Arkansas Attorney General**  
323 Center Street – Suite 200  
Little Rock, AR 72201  
*Dylan.Jacobs@arkasnasag.gov*

Dated: June 12, 2023.

/s/ Richard H. Mays  
Richard H. Mays