

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

PEOPLE FIRST OF ALABAMA)	
<i>et al.</i> ,)	
)	
v.)	CASE NO. 2:20-cv-00619-AKK
)	
JOHN MERRILL, in his official)	
capacity as Secretary of State of)	
Alabama <i>et al.</i> ,)	

JOINT MOTION FOR ENTRY OF SETTLEMENT

The Plaintiffs and Defendant Mary B. Roberson, in her official capacity as Circuit Clerk of Lee County, Alabama, (“Mrs. Roberson”) give notice to the Court that they have reached a settlement in this lawsuit. Pursuant to the terms of the governing Settlement Agreement (“the Settlement Agreement”), the Plaintiffs and Mrs. Roberson provide the following:

1. Upon the entry of the attached proposed order, the Plaintiffs dismiss with prejudice Mrs. Roberson, in her official capacity as Circuit Clerk of Lee County, Alabama, from this lawsuit.
2. The Settlement Agreement is incorporated by reference to this motion and the proposed order.
3. The Plaintiffs and Mrs. Roberson consent to this Court retaining jurisdiction to enforce the terms of the Settlement Agreement.

4. This dismissal does not affect the Plaintiffs' remaining claims against any other parties to this lawsuit, including against any person serving in the official capacity as Absentee Election Manager of Lee County, Alabama.

Respectfully submitted on June 30, 2020,

/s/ Robert J. Sewell
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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I certify that on June 30, 2020, I filed the foregoing document electronically the CM/ECF system, which will automatically serve all counsel of record.

/s/ Robert J. Sewell
OF COUNSEL

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[Proposed] ORDER

Before the Court is the Plaintiffs’ and Defendant Mary B. Roberson’s, in her official capacity as Circuit Clerk of Lee County, Alabama, (“Mrs. Roberson”) joint motion to approve a settlement. Because the Court is of the opinion that the Settlement Agreement is reasonable and fair, it is the ORDER, JUDGMENT, and DECREE of the Court that the joint motion to approve the settlement is granted and that this case is dismissed with prejudice against Mrs. Roberson, in her official capacity as Circuit Clerk of Lee County, Alabama, except as follows:

1. The Settlement Agreement is incorporated by reference into this order.
2. The Plaintiffs and Mrs. Roberson consent to this Court retaining jurisdiction to enforce the terms of the Settlement Agreement;
3. The Court does hereby retain jurisdiction to enforce the terms of the Settlement Agreement; and

4. The dismissal of Mrs. Roberson does not affect the Plaintiffs' claims against any other parties or any other Defendants to this lawsuit, including against any person serving in the official capacity as Absentee Election Manager of Lee County, Alabama.

It is further ORDERED that Mrs. Roberson's motion to dismiss (Doc. 54) is denied as moot.

DONE, this the ___ day of _____ 2020.

HON. ABDUL K. KALLON
U.S. DISTRICT JUDGE