

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

<hr/>		)	
NORTHWEST AUSTIN MUNICIPAL	)		
UTILITY DISTRICT NUMBER ONE,	)		
	)		
Plaintiff,	)		
	)		
v.	)	Civil Action No. 1:06-cv-1384	
	)		
ERIC H. HOLDER JR,	)	Three-judge court (PLF, EGS, DST)	
Attorney General of the United States, <i>et al.</i>	)		
	)		
Defendants.	)		
<hr/>	)		

JOINT MOTION FOR ENTRY OF CONSENT JUDGMENT AND DECREE

Plaintiff Northwest Austin Municipal Utility District Number One, Defendant Attorney General of the United States Eric H. Holder Jr, and Defendant-Intervenors Texas State Conference of NAACP Branches, Austin Branch of the NAACP, Rodney Louis, Nicole Louis, Winthrop Graham, Yvonne Graham, Wendy Richardson, Jamal Richardson, Marisa Richardson, David Diaz, Lisa Diaz, Gabriel Diaz, Nathaniel Lesane, Angie Garcia, Jovita Casarez, Ofelia Zapata, People for the American Way, and Travis County, Texas, through counsel, respectfully move this three-judge Court for entry of the attached Consent Judgment and Decree. The parties request that this Court wait 30 days after the filing of this joint motion, before approving this settlement, while the notice of proposed settlement is advertised (as described in Paragraph 33 of the attached Consent Judgment and Decree).

WHEREFORE, the parties respectfully pray that this joint motion be granted.

*Agreed and Consented To:*

*/s/ Gregory S. Coleman*

---

Gregory S. Coleman  
(admitted pro hac vice)  
Christian J. Ward  
(admitted pro hac vice)  
PROJECT ON FAIR REPRESENTATION  
YETTER, WARDEN & COLEMAN, L.L.P.  
221 West 6th Street, Suite 750  
Austin, Texas 78701  
[Tel.] (512) 533-0150  
[Fax] (512) 533-0120

*/s/ Erik S. Jaffe*

---

Erik S. Jaffe  
D.C. Bar No. 440112  
ERIK S. JAFFE, P.C.  
5101 34th Street N.W.  
Washington, D.C. 20008  
[Tel.] (202) 237-8165  
[Fax] (202) 237-8166

*Counsel for Plaintiff*  
*Northwest Austin Municipal Utility District Number One*

Dated: October 7, 2009

*Agreed and Consented To:*

CHANNING D. PHILLIPS  
Acting United States Attorney

LORETTA KING  
Acting Assistant Attorney General  
Civil Rights Division

CHRISTOPHER COATES  
Chief, Voting Section

*/s/ T. Christian Herren Jr*

---

T. CHRISTIAN HERREN JR  
chris.herren@usdoj.gov  
SARAH E. HARRINGTON  
sarah.harrington@usdoj.gov  
CHRISTY A. MCCORMICK  
christy.mccormick@usdoj.gov  
Attorneys  
Civil Rights Division  
United States Department of Justice  
Room 7254 - NWB  
950 Pennsylvania Ave., N.W.  
Washington, DC 20530  
Phone: (800) 253-3931  
Fax: (202) 307-3961

*Counsel for Defendant Eric H. Holder Jr  
Attorney General of the United States*

Dated: October 7, 2009

*Agreed and Consented To:*

*/s/ Paul R.Q. Wolfson*

---

Seth P. Waxman (D.C. Bar No. 257337)  
Paul R.Q. Wolfson (D.C. Bar No. 414759)  
WILMER CUTLER PICKERING HALE and  
DORR LLP  
1875 Pennsylvania Ave. N.W.  
Washington, D.C. 20006  
Telephone: (202) 663-6000  
Facsimile: (202) 663-6363

Jon M. Greenbaum (D.C. Bar No. 489887)  
LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW  
1401 New York Avenue, NW, Suite 400  
Washington, D.C. 20005  
Telephone: 202-662-8600  
Facsimile: 202-628-2858

Dennis C. Hayes (Indiana Bar No. 7601-49) (admitted pro hac vice)  
General Counsel  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE, INC.  
NAACP National Office  
4805 Mt. Hope Drive  
Baltimore, MD 21215  
Telephone: (410) 580-5777  
Facsimile: (410) 358-9350

*Counsel for Defendant-Intervenors*  
*Texas State Conference of NAACP Branches*  
*and Austin Branch of the NAACP*

Dated: October 7, 2009

*Agreed and Consented To:*

*/s/ Debo P. Adegbile*

---

John A. Payton (D.C. Bar No. 282699)  
Director-Counsel  
Debo P. Adegbile  
Ryan P. Haygood  
Jenigh J. Garrett  
NAACP Legal Defense and  
Educational Fund, Inc.  
99 Hudson Street, Suite 1600  
New York, New York 10013  
(212) 219-1900

Kristen M. Clarke (D.C. Bar. No. 973885)  
NAACP Legal Defense and  
Educational Fund, Inc.  
1444 Eye Street, N.W., 10th Floor  
Washington, D.C. 20005  
(202) 682-1300

*Counsel for Defendant-Intervenors*  
*Rodney Louis, Nicole Louis,*  
*Winthrop Graham, Yvonne Graham,*  
*Wendy Richardson, Jamal Richardson,*  
*and Marisa Richardson*

Dated: October 7, 2009

*Agreed and Consented To:*

*/s/ Nina Perales*

---

NINA PERALES  
Texas State Bar No. 240054046  
MEXICAN AMERICAN LEGAL  
DEFENSE AND EDUCATIONAL FUND  
110 Broadway, Suite 300  
San Antonio, Texas 78205  
(210) 224-5476 (telephone)  
(210) 224-5382 (facsimile)  
nperales@maldef.org

*/s/ Joseph E. Sandler*

---

JOSEPH E. SANDLER  
D.C. Bar # 255919  
Sandler Reiff & Young PC  
50 E St SE # 300  
Washington, D.C. 20003  
Tel: (202) 479 1111  
Fax (202) 479-1115  
sandler@sandlerreiff.com

*Counsel for Defendant-Intervenors  
David Diaz, Lisa Diaz and Gabriel Diaz*

Dated: October 7, 2009

*Agreed and Consented To:*

*/s/ Moffatt Laughlin McDonald*

---

Moffatt Laughlin McDonald  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION, INC.  
230 Peachtree Street, NW  
Suite 1440  
Atlanta, GA 30303  
(404) 523-2721  
Fax: (404) 653-0331  
lmcdonald@aclu.org

Arthur B. Spitzer  
AMERICAN CIVIL LIBERTIES UNION  
1400 20th Street, NW, Suite 119  
Washington, DC 20036  
(202) 457-0800  
Fax: (202) 452-1868  
artspitzer@aol.com

Michael J. Kator  
KATOR, PARKS & WEISER, PLLC  
1020 19th Street, NW, #350  
Washington, DC 20036-6101  
(202) 898-4800  
Fax: (202) 289-1389  
mkator@katorparks.com

Jeremy Wright  
KATOR, PARKS & WEISER, PLLC  
812 San Antonio Street, Suite 100  
Austin, Texas 78701

Lisa Graybill  
Legal Director  
ACLU Foundation of Texas  
1210 Rosewood Avenue  
Austin, Texas 78702

*Counsel for Defendant-Intervenor  
Nathaniel Lesane*

Dated: October 7, 2009

*Agreed and Consented To:*

*/s/ Jose Garza*

---

Jose Garza  
Judith A. Sanders-Castro  
George Korbel  
Texas RioGrande Legal Aid, Inc.  
1111 N. Main Street  
San Antonio, Texas 78212  
210-212-3700  
210-212-3772 (fax)

Alpha Hernandez  
Eloy Padilla  
Texas RioGrande Legal Aid, Inc.  
309 Cantu Street  
Del Rio, Texas 78840  
830-775-1535  
830-768-0997 (fax)

*/s/ Michael T. Kirkpatrick*

---

Michael T. Kirkpatrick (DC Bar No. 486293)  
Brian Wolfman (DC Bar No. 427491)  
Public Citizen Litigation Group  
1600 20th Street NW  
Washington, DC 20009  
202-588-7728  
202-588-7795 (fax)  
mkirkpatrick@citizen.org

*Counsel for Defendant-Intervenors  
Angie Garcia, Jovita Casarez, and Ofelia Zapata*

Dated: October 7, 2009



*Agreed and Consented To:*

*/s/ Margery F. Baker*

---

Margery F. Baker (DC Bar # 438305)  
People For the American Way Foundation  
2000 M Street NW, Suite 400  
Washington, DC 20036  
(202) 467-4999  
mbaker@pfaw.org

*Counsel for Defendant-Intervenor  
People for the American Way*

Dated: October 7, 2009

*Agreed and Consented To:*

*/s/ Max Renea Hicks*

---

Max Renea Hicks  
Attorney at Law  
101 West 6<sup>th</sup> Street, Suite 504  
Austin, Texas 78701-2934  
(512) 480-8231  
fax: (512) 480-9105  
rhicks@renea-hicks.com

*Counsel for Defendant-Intervenor  
Travis County, Texas*

Dated: October 7, 2009

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2009, I caused to be served a copy of the foregoing Joint Motion for Entry of Consent Judgment and Decree, along with the attached Consent Judgment and Decree, through the Court's ECF filing system, to counsel of record.

*/s/ T. Christian Herren Jr*

---

T. CHRISTIAN HERREN JR