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 13 UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF WASHINGTON

14 ROGELIO MONTES and
 15 MATEO ARTEAGA,
 16
 17 Plaintiffs,

18 v.

19 CITY OF YAKIMA, et al.,
 20
 21 Defendants.

Case No. 12-CV-3108-TOR

MOTION FOR LEAVE TO FILE
 STATEMENT OF INTEREST
 OF THE UNITED STATES OF
 AMERICA

Notice: September 15, 2014
 Time: 6:30 p.m.

Without oral argument

1 The United States respectfully moves for leave to file the attached Statement
2 of Interest, pursuant to 28 U.S.C. § 517, which authorizes the Attorney General to
3 attend to the interests of the United States in any pending suit.

4 To address important questions about the interpretation of federal law,
5 including questions that implicate the interpretation of Section 2 of the Voting
6 Rights Act, 42 U.S.C. § 1973 (“Section 2”), the Attorney General has filed
7 numerous statements of interest in federal district court cases in which the United
8 States was not a party. *See, e.g.*, Statement of Interest of the United States of
9 America, *Ohio State Conf. NAACP v. Husted*, No. 2:14-cv-00404 (S.D. Ohio, July
10 30, 2014) (No. 49) (regarding early voting and registration in the context of Section
11 2); Statement of Interest of the United States of America, *Toyukak v. Treadwell*, No.
12 3:13-cv-137 (D. Alaska, June 3, 2014) (No. 121) (regarding the interpretation and
13 application of the language minority requirements of Section 203 of the Voting
14 Rights Act, 42 U.S.C. § 1973aa-1a); Statements of Interest of the United States of
15 America, *Wandering Medicine v. McCulloch*, No. 1:12-cv-135 (D. Mont. Oct. 24,
16 2012, Apr. 25, 2014) (Nos. 45 and 194) (regarding the location of in-person late
17 registration and early voting sites in the context of Section 2); *see also* Statement of
18 Interest of the United States, *Wilbur v. City of Mount Vernon*, No. C11-1100 (W.D.
19 Wash. Aug. 14, 2013) (No. 322) (regarding appropriate remedies in a juvenile
20 justice public defense matter).

21 These and numerous other cases represent examples of where the United
22 States had a substantial interest in ensuring federal law was properly interpreted as
23 well as vigorously and uniformly enforced. The matter before this Court today
24 raises a similarly important question, specifically regarding the appropriate
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AMERICA- 2

1 population standard that a plaintiff should use when drawing illustrative districts in a
2 Section 2 vote dilution case. The United States has a substantial interest in ensuring
3 the proper interpretation and application of Section 2 as it regards this question. The
4 United States therefore submits the attached Statement of Interest for the limited
5 purpose of addressing that question of law as it relates to this case and the pending
6 motions for summary judgment.

7 Counsel for the United States has consulted with counsel for the parties to this
8 case regarding the filing of this motion, and counsel for Plaintiffs advise that they do
9 not oppose this motion, and counsel for Defendants advise that they do oppose this
10 motion.

11 Accordingly, the United States respectfully requests leave to file the attached
12 Statement of Interest.

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RESPECTFULLY SUBMITTED this 15th day of August, 2014.

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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses indicated on the Court's Electronic Mail Notice List.

s/Pamela J. DeRusha
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