	Case 2:12-cv-03108-TOR Doct	ument 140 Filed 10/30/14
1 2 3 4 5 6	Justo G. Gonzalez, WSBA No. 39127 STOKES LAWRENCE VELIKANJE MOORE & SHORE 120 N. Naches Avenue Yakima, Washington 98901-2757 (509) 853-3000 Email: Justo.Gonzalez@stokeslaw.com Attorneys for Yakima Valley Latin@ Leader	HONORABLE THOMAS O. RICE
7 8	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON AT SPOKANE	
<ol> <li>9</li> <li>10</li> <li>11</li> <li>12</li> <li>13</li> <li>14</li> <li>15</li> <li>16</li> </ol>	ROGELIO MONTES and MATEO ARTEAGA, Plaintiffs, v. CITY OF YAKIMA; MICAH CAWLEY, in his official capacity as Mayor of Yakima; and MAUREEN ADKISON, SARA BRISTOL, KATHY COFFEY, RICK ENSEY, DAVE ETTLE, and BILL LOVER, in their official capacity as members of the Yakima City Council,	Case No.: 12-CV-3108-TOR MOTION FOR LEAVE TO FILE RESPONSE IN SUPPORT OF PLAINTIFFS' 7-SINGLE MEMBER DISTRICT PLAN NOTED FOR MOTION CALENDAR: OCTOBER 31, 2014 at 6:30 p.m. WITHOUT ORAL ARGUMENT
17 18	Defendants.	
<ol> <li>18</li> <li>19</li> <li>20</li> <li>21</li> <li>22</li> </ol>	Yakima Valley Latin@ Leaders for Change ("YVLLC") respectfully moves this Court for leave to file a Response in Support of Plaintiffs' 7-Single Member District Plan. YVLLC has conferred with Plaintiffs regarding this Motion. Plaintiffs do not object to the Motion. YVLLC has not conferred with Defendants regarding this Motion.	
23 24	MOTION FOR LEAVE TO FILE RESPON OF PLAINTIFFS' 7-SINGLE MEMBER DI JGG-000 \ 1935248	SE IN SUPPORT STOKES LAWRENCE

YVLLC is a group of local Latina/o Leaders who advocate for just political
 representation. Those in the group have worked for many years to make Yakima and the
 Yakima Valley a better place for all it residents, but most especially a better place for
 Latino residents to live, work, and raise families. Many have business owners and long time community members, and many have run for office and supported other Latino
 candidates in Yakima.

As stated in Exhibit 1, YVLLC supports Plaintiffs' proposal for seven singlemember districts as the appropriate remedy for the violations of Section 2 of the Voting Rights Act this Court concluded have occurred and are occurring under Defendants' current scheme of open districts.

For the reasons stated above, YVLLC respectfully requests that this Court grant this Motion for Leave to File a Response in Support of Plaintiffs' 7-Single Member District Plan.

DATED this 30th day of October, 2014.

## STOKES LAWRENCE VELIKANJE MOORE & SHORE

By: <u>s/ Justo G. Gonzalez</u> Justo G. Gonzalez (WSBA No. 39127) Attorney for Yakima Valley Latin@ Leaders for Change Stokes Lawrence Velikanje Moore & Shore 120 N. Naches Avenue Yakima, WA 98901-2757 Telephone: (509) 853-3000 Fax: (509) 895-0060 Email: Justo.Gonzalez@stokeslaw.com

	Case 2:12-cv-03108-TOR Document 140 Filed 10/30/14			
1	CERTIFICATE OF SERVICE			
2	I hereby certify that on October 30, 2014, I caused the foregoing Motion for Leave to File Response in Support of Plaintiffs' 7-Single Member District Plan to be:			
3	$\boxtimes$ electronically filed with the Clerk of the Court using the CM/ECF system which			
4	will send notification of such filing to the following:			
5	Joaquin Guadalupe Avila Law Office of Joaquin G Avila			
6	19841 North Fremont Avenue Shoreline, WA 98133			
7	jgavotingrights@gmail.com			
8	Kevin J. Hamilton Perkins Coie - SEA			
9	1201 Third Avenue, 40th Floor Seattle, WA 98101-3099			
10	khamilton@perkinscoie.com			
11	La Rond Baker ACLU of Washington			
12	901 5th Avenue, Suite 630 Seattle, WA 98164			
13	lbaker@aclu-wa.org			
14	Sarah Anne Dunne ACLU of Washington Foundation			
15	901 5th Avenue, #630 Seattle, WA 98164			
16	dunne@aclu-wa.org			
17	Abha Khanna Perkins Coie - SEA			
18	1201 Third Avenue, 40th Floor Seattle, WA 98101-3099			
19	akhanna@perkinscoie.com			
20	Noah G Purcell Perkins Coie - SEA			
21	1201 Third Avenue 40th Floor			
22	Seattle, WA 98101-3099 npurcell@perkinscoie.com			
23				
24	MOTION FOR LEAVE TO EILE DESDONGE IN SUDDORT			
	MOTION FOR LEAVE TO FILE RESPONSE IN SUPPORT OF PLAINTIFFS' 7-SINGLE MEMBER DISTRICT PLAN - 3 JGG-000 \ 1935248 SHORE L20 N. NACHES AVENUE YAKIMA, WASHINGTON 98901-2757 (509) 853-3000			

	Case 2:12-cv-03108-TOR Document 140 Filed 10/30/14		
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5	230 Peachtree Street Northwest, Suite 1440 Atlanta, GA 30303-1513		
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9	ffloyd@floyd-ringer.com		
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14	200 West Thomas Street, Suite 500 Seattle, WA 98119-4296		
15	smoore@floyd-ringer.com		
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18	Spokane, WA 99210-1494		
19	USAWAE.PDeRushaECF@usdoj.gov		
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	MOTION FOR LEAVE TO FILE RESPONSE IN SUPPORT OF PLAINTIFFS' 7-SINGLE MEMBER DISTRICT PLAN - 4 JGG-000\1935248 STOKES LAWRENCE VELIKANJE MOORE & SHORE 120 N. NACHES AVENUE YAKIMA, WASHINGTON 98901-2757 (509) 853-3000		

	Case 2:12-cv-03108-TOR Document 140 Filed 10/30/14
1 2 3	Christopher G Emch Foster Pepper & Shefelman PLLC - SEA 1111 Third Avenue, Suite 3400 Seattle, WA 98101-3299 emchc@foster.com
4	
5	s/ Justo C. Conzeloz
6	<u>s/ Justo G. Gonzalez</u> Justo G. Gonzalez (WSBA No. 39127) Attorney for Yakima Valley Latin@ Leaders
7	for Change Stokes Lawrence Velikanje Moore & Shore
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<b>2</b> 7	MOTION FOR LEAVE TO FILE RESPONSE IN SUPPORT OF PLAINTIFFS' 7-SINGLE MEMBER DISTRICT PLAN - 5 JGG-000 \ 1935248 STOKES LAWRENCE VELIKANJE MOORE & SHORE 120 N. NACHES AVENUE YAKIMA, WASHINGTON 98901-2757 (509) 853-3000