

STATE OF NORTH CAROLINA

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
CASE NO. 19 CVS 15941

WAKE COUNTY

2022 MAR 30 P 3:39

COMMUNITY SUCCESS INITIATIVE,
et al.,

WAKE CO., G.S.C.

Plaintiffs,

NOTICE OF APPEAL

vs.

TIMOTHY K. MOORE, et al.,

Defendants.

TO THE HONORABLE COURT OF APPEALS OF NORTH CAROLINA:

Defendants Timothy K. Moore, in his official capacity as Speaker of the North Carolina House of Representatives, and Philip E. Berger, in his official capacity as President Pro Tempore of the North Carolina Senate (the "Legislative Defendants"), by and through counsel, pursuant to Rule 3(a) of the North Carolina Rules of Appellate Procedure, do hereby notice their appeal to the Court of Appeals of North Carolina from 1) the Final Judgment and Order of the three-judge panel composed of the Honorable Lisa C. Bell, Keith O. Gregory, and John M. Dunlow entered on March 28, 2022 in the Superior Court, Wake County declaring N.C.G.S. §13-1 in violation of the North Carolina Constitution's Equal Protection Clause and Free Elections Clause and enjoining Defendants from preventing any person convicted of a felony from registering to vote or voting due to probation, parole, or post-release supervision and 2) the Summary Judgment Order entered on September 4, 2020 by this same panel declaring that N.C.G.S. §13-1 violates the Ban on Property Qualifications of the North Carolina Constitution and the Equal Protection Clause of the North Carolina Constitution.

Respectfully submitted, this the 30th day of March, 2022.

 (with permission)

Nicole Jo Moss
NC Bar No. 31958
COOPER & KIRK, PLLC
1523 New Hampshire Avenue, NW
Washington, D.C. 20036
Telephone: (202) 220-9600
Facsimile: (202) 220-9601
nmoss@cooperkirk.com

Nathan Huff
North Carolina Bar #40626
K&L Gates
430 Davis Drive
Suite 400
Morrisville, NC 27560
Telephone: (919) 314-5636
Facsimile: (919) 516-2045
Nate.Huff@klgates.com

Counsel for Legislative Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion was served on the parties to this action via email to counsel at the following addresses:

FORWARD JUSTICE
400 Main Street, Suite 203
Durham, NC 27701
Telephone: (984) 260-6602
Daryl Atkinson
daryl@forwardjustice.org
Caitlin Swain
cswain@forwardjustice.org
Whitley Carpenter
wcarpenter@forwardjustice.org
Kathleen Roblez
kroblez@forwardjustice.org
Ashley Mitchell
amitchell@forwardjustice.org

ARNOLD & PORTER KAYE
SCHOLER LLP
601 Massachusetts Avenue NW
Washington, DC 20001
Telephone: (202) 942-5000
Elisabeth Theodore*
elisabeth.theodore@arnoldporter.com
R. Stanton Jones*
stanton.jones@arnoldporter.com

PROTECT DEMOCRACY PROJECT
2120 University Avenue
Berkeley, CA 94704
Telephone: (858) 361-6867
Farbod K. Faraji*
farbod.faraji@protectdemocracy.org

Counsel for Plaintiffs

This the 30th day of March, 2022.

NORTH CAROLINA DEPARTMENT
OF JUSTICE
Post Office Box 629
Raleigh, NC 27602
Telephone: (919) 716-0185
Terence Steed
tsteed@ncdoj.gov

*Counsel for the State Board
Defendants*

 (with permission)

Nicole Jo Moss

Counsel for Legislative Defendants