

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

TATI ABU KING *and* TONI HEATH JOHNSON,

Plaintiffs,

v.

JOHN O'BANNON, *in his official capacity as Chairman of the State Board of Elections for the Commonwealth of Virginia*; ROSALYN R. DANCE, *in her official capacity as Vice Chair of the State Board of Elections for the Commonwealth of Virginia*; GEORGIA ALVIS-LONG, *in her official capacity as Secretary of the State Board of Elections for the Commonwealth of Virginia*; DONALD W. MERRICKS, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; MATTHEW WEINSTEIN, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; SUSAN BEALS, *in her official capacity as Commissioner of the Department of Elections for the Commonwealth of Virginia*; ERIC SPICER, *in his official capacity as the General Registrar of Fairfax County, Virginia*; and SANDY C. ELSWICK, *in her official capacity as the General Registrar of Smyth County, Virginia*,

Defendants.

Case No. 3:23-cv-00408 (JAG)

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT
AND PERMANENT INJUNCTIVE RELIEF**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiffs Tati Abu King and Toni Heath Johnson ("Plaintiffs"), on behalf of themselves and all others similarly situated, respectfully move this Court for entry of summary judgment and permanent injunction in their favor with respect to all remaining counts in the Complaint for the reasons set forth in the accompanying memorandum of law and statement of undisputed material facts.

In support of this motion, Plaintiffs have contemporaneously filed (1) a memorandum of law in support; (2) a statement of undisputed material facts; (3) a Declaration of Brittany Blueitt Amadi, Declaration of Carissa Byrne Hessick, Declaration of Edward L. Ayers, Declaration of Toni Johnson, and Declaration of Tati King; and (4) a proposed order.

Dated: July 18, 2025

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Counsel for Plaintiffs

**admitted pro hac vice*

***pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on July 18, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically e-mail notification of such filing to all counsel of record.

/s/ Brittany Blueitt Amadi

Brittany Blueitt Amadi (VSB No. 80078)

Counsel for Plaintiff