

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

Case No.: 1:23-cv-00302-LCB-JLW

AMERICAN CIVIL LIBERTIES )  
UNION OF NORTH CAROLINA, )

Plaintiff, )

v. )

JOSHUA STEIN, *in his official* )  
*capacity as Attorney General of the* )  
*State of North Carolina,* SATANA )  
DEBERRY, *in her official capacity as* )  
*District Attorney of the 16th* )  
*Prosecutorial District,* AVERY )  
MICHELLE CRUMP, *in her official* )  
*capacity as District Attorney of the* )  
*24th Prosecutorial District and* )  
LORRIN FREEMAN, *in her official* )  
*capacity as District Attorney of the* )  
*10th Prosecutorial District,* and as )  
representatives of a class of all )  
district attorneys in the state of )  
North Carolina, )

Defendants. )

RESPONSE OF DA  
DEFENDANTS IN  
OPPOSITION TO  
PLAINTIFF'S AMENDED  
MOTION FOR  
PRELIMINARY  
INJUNCTION

NOW COME Defendants Satana Deberry, in her official capacity as District Attorney for the 16th Prosecutorial District, Avery Michelle Crump, in her official capacity as District Attorney for the 24th Prosecutorial District and Lorrin Freeman, in her official capacity as District Attorney for the 10th

Prosecutorial District (“DA Defendants”), submit this response in opposition to Plaintiff’s Amended Motion for Preliminary Injunction (DE 30).

In the interest of judicial economy and because the arguments are identical, the DA Defendants adopt and incorporate by reference the entirety of Defendant Stein’s Response to Motion for Preliminary Injunction (DE 37) as though fully set forth herein.

Respectfully submitted, this the 28th day of July, 2023.

JOSHUA H. STEIN  
Attorney General

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*Counsel for Defendants Deberry,  
Crump and Freeman*

**CERTIFICATION OF WORD COUNT**

The undersigned hereby certifies that the foregoing memorandum complies with Local Rule 7.3(d)(1) in that, according to the word processing program used to produce this brief (Microsoft Word), the document does not exceed 6,250 words exclusive of caption, cover, signature lines, index, and certificate of service.

This 28<sup>th</sup> day of July, 2023.

/s/Joseph Finarelli

Joseph Finarelli

Special Deputy Attorney General

**CERTIFICATE OF SERVICE**

This is to certify that I electronically filed the foregoing **RESPONSE OF DA DEFENDANTS IN OPPOSITION TO PLAINTIFF'S AMENDED MOTION FOR PRELIMINARY INJUNCTION** using the CM/ECF system, which will serve a copy on all counsel of record.

This the 28th day of July, 2023.

/s/ Joseph Finarelli  
Joseph Finarelli  
Special Deputy Attorney General