

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case No. 5:24-CV-547-M**

REPUBLICAN NATIONAL COMMITTEE,
NORTH CAROLINA REPUBLICAN
PARTY.,

Plaintiffs,

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS, *et al.*,

Defendants,

and

DEMOCRATIC NATIONAL COMMITTEE,

Intervenor-Defendant.

**JOINT MOTION FOR ENTRY OF
CONSENT JUDGMENT**

Plaintiffs Republican National Committee and the North Carolina Republican Party (“Plaintiffs”) together with Defendants North Carolina State Board of Elections, Sam Hayes, in his official capacity as Executive Director of the North Carolina State Board of Elections, Francis X. Deluca, Jeff Carmon, Stacy Eggers IV, Siobhan O’Duffy Millen, and Robert Rucho, each in their official capacities (“Defendants”), and the Democratic National Committee (“Intervenor-Defendant”) jointly and respectfully move the Court for entry of the attached Stipulation and Consent Judgment, provided as **Exhibit 1** to this Motion. The Parties respectfully request that the Court sign and enter the Consent Judgment as its final order and judgment in this case.

Respectfully submitted this, the 16 day of February, 2026.

[Signatures on following page]

**NORTH CAROLINA DEPARTMENT OF
JUSTICE**

/s/ Mary L. Lucasse

Mary L. Lucasse
Special Deputy Attorney General
N.C. Bar No. 39153
P.O. Box 629
Raleigh, NC 27602
Phone: (919) 716-6900
Facsimile: (919) 716-6763
mlucasse@ncdoj.gov
*Counsel for North Carolina State Board of
Elections,*

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

/s/ Phillip J. Strach

Phillip J. Strach
N.C. Bar No. 29456
Jordan A. Koonts
N.C. Bar No. 59363
301 Hillsborough Street, Suite 1400
Raleigh, NC 27603
Phone: (919) 329-3800
Facsimile: (919) 329-3799
Phil.strach@nelsonmullins.com
Jordan.koonts@nelsonmullins.com
Counsel for RNC Plaintiffs

**BROOKS PIERCE MCLENDON
HUMPHREY & LEONARD, LLP**

/s/ Shana L. Fulton

Jim W. Phillips, Jr.
N.C. Bar No. 12516
Shana L. Fulton
N.C. Bar No. 27836
William A Robertson
N.C. Bar No. 53589
James W. Whalen
N.C. Bar No. 58477
150 Fayetteville St.
1700 Wells Fargo Capitol Center
Raleigh, NC 27601
Phone: (919) 839-0300
jphillips@brookspierce.com
sfulton@brookspierce.com
wrobertson@brookspierce.com
jwhalen@brookspierces.com

**WILMER CUTLER PICKERING HALE
AND DORR LLP**

/s/ Seth P. Waxman

Seth P. Waxman*
Daniel S. Volchok*
Christopher E. Babbitt*
2100 Pennsylvania Avenue N.W.
Washington, D.C. 20037
Phone: (202) 663-6000
seth.waxman@wilmerhale.com
Daniel.volchok@wilmerhale.com
Christopher.babbitt@wilmerhale.com
*Admitted Pro-Hac Vice
Counsel for Democratic National Committee

CERTIFICATE OF SERVICE

I hereby certify that on this, the 16 day of February, 2026, I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF electronic filing system, which will cause a true and accurate copy of the same to be served upon all counsel of record in this matter.

By: /s/ Jordan A. Koonts
Jordan A. Koonts (NCSB No. 59363)