IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
Statesville Division

WATAUGA COUNTY VOTING RIGHTS TASK FORCE, et al., Plaintiffs, v. WATAUGA COUNTY BOARD OF ELECTIONS, et al., Defendants, and PHILIP E. BERGER, in his official capacity as President *Pro Tempore* of the North Carolina Senate, and DESTIN HALL, in his official capacity as Speaker of the North Carolina House of Representatives. Intervenor-Defendants.	**CONSENT MOTION TO AMEND COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), Plaintiffs WATAUGA COUNTY VOTING RIGHTS TASK FORCE, COMMON CAUSE, DR. RAY RUSSELL, LARRY TURNBOW, CHARLIE WALLIN, DR. JAMES FENWICK, JR., LAURIE FLEMING, PATRICIA DALE, and KINNEY RAY BAUGHMAN, hereby move the Court to amend their Complaint. The proposed amendment removes Count One (the malapportionment claim) of the original Complaint and the corresponding factual allegations. The proposed First Amended Complaint, which is attached hereto as Exhibit A, contains no new factual allegations or legal claims.

Plaintiffs have consulted the Defendants and Intervenor-Defendants pursuant to Local Rule 7.1(b). The Defendants and Intervenor-Defendants consent to this motion.

This the 3rd day of April, 2026.

BROOKS, PIERCE, MCLENDON,
HUMPHREY & LEONARD, L.L.P.

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Attorneys for Plaintiffs

CERTIFICATION OF CONFERRAL

I hereby certify that counsel for the Plaintiffs have conferred with counsel for the Defendants and Intervenor-Defendants in accordance with Local Rule 7.1. Defendants and Intervenor-Defendants consent to Plaintiffs' motion to amend.

This the 3rd day of April, 2026.

/s/ Eric F. Fletcher
Eric F. Fletcher

CERTIFICATION IN COMPLIANCE WITH STANDING ORDER REGARDING USE OF ARTIFICIAL INTELLIGENCE

I hereby certify that (a) no artificial intelligence was employed in doing the research for the preparation of this document, with the exception of such artificial intelligence embedded in the standard on-line legal research sources Westlaw, Lexis, FastCase, and Bloomberg, and (b) every statement and every citation to an authority contained in this document has been checked by an attorney in this case and/or a paralegal working at his/her direction as to the accuracy of the proposition for which it is offered, and the citation to authority provided.

This the 3rd day of April, 2026.

/s/ Eric F. Fletcher
Eric F. Fletcher

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing has been served on all parties to this action by filing the same in the Court's Case Management/Electronic Case Filing System, which will send a Notice of Electronic Filing to all counsel of record for the parties.

This the 3rd day of April, 2026.

/s/ Eric F. Fletcher
Eric F. Fletcher