
IN THE
UNITED STATES DISTRICT COURT
FOR EASTERN DISTRICT OF VIRGINIA

IN RE: VIRGINIA GENERAL ASSEMBLY

MOTION TO AMEND TO EXPAND ORDER
TO REDRAW LEGISLATIVE DISTRICT LINES

COMES NOW THE PETITIONER WAKEEL ABDUL-SABUR HEREBY MOVES THIS HONORABLE COURT TO AMEND TO EXPAND THE ORDER REQUIRING THE VIRGINIA GENERAL ASSEMBLY TO REDRAW LEGISLATIVE DISTRICT LINES. IN SUPPORT OF THIS MOTION THE PETITIONER STATE THE FOLLOWING FACTS.

- (i) A THREE-JUDGE PANEL OF THE U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RULED ON JUNE 26, 2018 THAT THE LINES FOR (11) ELEVEN HOUSE OF DELEGATES DISTRICTS HAD BEEN DRAWN WITH THE PURPOSE OF CONCENTRATING BLACK VOTERS.

(ii) THIS HONORABLE COURT ORDERED LAWMAKERS IN JUNE TO REDRAW THE STATE'S LEGISLATIVE MAP BY OCTOBER 30, 2018 AFTER IT FOUND THAT SOME DISTRICTS WERE UNCONSTITUTIONALLY GERRYMANDED. REPUBLICANS ARE APPEALING THE RULING AND HAD WANTED THE DEADLINE PUT ON HOLD.

(iii) SUBSEQUENTLY THIS HONORABLE COURT WROTE THAT DELAYING WORK ON A REMEDIAL MAP PLAN WOULD LIKELY RESULT IN THE 2019 ELECTIONS PROCEEDING UNDER UNCONSTITUTIONAL DISTRICTS AND WOULD LIKELY CAUSE IRREPARABLE INJURY TO THE PLAINTIFFS IN THE LAWSUIT, WHO ARE VIRGINIA VOTERS.

(iv) THE DEADLINE HAS BEEN POSTPONED TO MARCH 2019.

ARGUMENT TO CONSIDER

(v) THE PETITIONER REQUEST TO EXPAND THE ORDER TO INCLUDE PRISON GERRYMANDERING BECAUSE THE STATE OF VIRGINIA HAS CONCENTRATED AFRICAN AMERICANS IN SOUTH WEST VIRGINIA FOR DISTRICTING PURPOSES.

(vi) THE PROBLEM IS PRISONER'S PHYSICAL LOCATION IS BEING COUNTED WHERE THEY ARE INCARCERATED.

THE SOLUTION TO THIS PROBLEM IS TO ORDER THE VIRGINIA GENERAL ASSEMBLY PASS LEGISLATION TO COUNT INCARCERATED PEOPLE AT HOME FOR REDISTRICTING PURPOSES.

(VII) THE STATE OF VIRGINIA IS ILLEGALLY PACKING INCARCERATED AFRICAN AMERICANS IN SOUTHWEST VIRGINIA WHERE THE MAJORITY OF LAWMAKERS ARE REPUBLICANS AND THE INCARCERATED INMATE'S PHYSICAL LOCATION IS BEING COUNTED WHERE THAT REPUBLICAN LAWMAKER HAS DISTRICT SEATS.

WHEREFORE THE PETITIONER PRAYS THAT THE HONORABLE COURT EXPAND THE ORDER FROM ITS RULING ISSUED ON JUNE 26, 2018

CERTIFICATE OF SERVICE

UNDER PENALTY OF PERJURY THE PETITIONER CERTIFIES ON THIS 11TH DAY OF DECEMBER 2018 THAT ONE COPY OF FOREGOING MOTION TO AMEND TO EXPAND ORDER TO REDRAW LEGISLATIVE LINES TO: G.O.P. HOUSESPEAKER KIRK COX@ P.O. BOX 406, RICHMOND, VA. 23218-0406

1st Wakeel Abdul Sabur 12/11/18
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