

In the Supreme Court of the United States

ROBERT RUCHO, ET AL.,
Applicants,

v.

COMMON CAUSE, ET AL.,
Respondents.

On Emergency Application for Stay of Order
Invalidating Congressional Districts Pending Appeal to the
Supreme Court of The United States

**MOTION FOR LEAVE TO FILE AMICUS BRIEF, MOTION FOR LEAVE
TO FILE BRIEF ON 8 1/2 BY 11 INCH PAPER, AMICUS BRIEF FOR
GEORGE HOLDING, WALTER B. JONES, JR., VIRGINIA FOXX, MARK
WALKER, DAVID ROUZER, RICHARD HUDSON, ROBERT
PITTENGER, PATRICK T. McHENRY, MARK MEADOWS, and TED
BUDD AS AMICI CURIAE IN SUPPORT OF APPLICANTS**

To the Honorable John G. Roberts, Jr.
Chief Justice of the United States and
Circuit Justice for the Fourth Circuit

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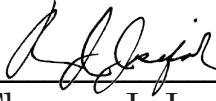
Respondents.

**MOTION FOR LEAVE TO FILE AMICUS BRIEF
IN SUPPORT OF EMERGENCY APPLICATION FOR STAY
FOR GEORGE HOLDING, WALTER B. JONES, JR., VIRGINIA FOXX,
MARK WALKER, DAVID ROUZER, RICHARD HUDSON, ROBERT
PITTENGER, PATRICK T. McHENRY, MARK MEADOWS, and TED
BUDD**

George Holding, Walter B. Jones, Jr., Virginia Foxx, Mark Walker, David Rouzer, Richard Hudson, Robert Pittenger, Patrick T. McHenry, Mark Meadows, and Ted Budd (“Amici Members”), all Members of Congress representing North Carolina, respectfully move for leave of Court to file the accompanying amicus brief in support of Applicants’ Emergency Application for Stay.

In support of their motion, Amici Members assert that the district court ruling at issue raises grave concerns about disruption of 2018 elections. Amici Members assert the ruling creates exigent circumstances that warrant being permitted to be heard on the issue of Applicants’ Emergency Application for Stay and request their motion to file the attached amicus brief be granted.

Respectfully submitted on this 16th day in January, 2018,



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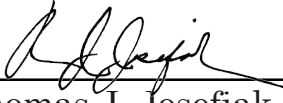
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MARK MEADOWS, and TED BUDD**

George Holding, Walter B. Jones, Jr., Virginia Foxx, Mark Walker, David Rouzer, Richard Hudson, Robert Pittenger, Patrick T. McHenry, Mark Meadows, and Ted Budd, Members of Congress representing North Carolina, respectfully move for leave of Court to file their amicus brief in support of Applicants' Emergency Application for Stay on 8 ½ by 11-inch paper rather than in booklet form.

In support of their motion, Amici Members assert that the Emergency Application for Stay filed by North Carolina in this matter was filed on Friday, January 12, 2018. The expedited filing of North Carolina's application and the resulting compressed deadline for any response prevented Amici Members from being able to get this brief prepared for printing and filing in booklet form. Nonetheless, Amici Members desire to be heard on the application and request the Court grant this motion and accept the paper filing.

Respectfully submitted on this 16th day in January, 2018,



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STAY FOR GEORGE HOLDING, WALTER B. JONES, JR., VIRGINIA
FOXX, MARK WALKER, DAVID ROUZER, RICHARD HUDSON, ROBERT
PITTENGER, PATRICK T. McHENRY, MARK MEADOWS, and TED BUDD¹**

STATEMENT OF INTEREST OF AMICI CURIAE

Amici curiae are Members of Congress representing districts within the state of North Carolina. The Amici Members have a vital interest in the law regarding redistricting since congressional districts directly impact their constituents, campaigns, and elections. Accordingly, the district court's ruling has obvious and widespread implications for the Members and their constituents as the 2018 election cycle is already well underway.

¹ No counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of this brief. No person other than amicus curiae, made a monetary contribution to its preparation or submission.

ARGUMENT

Applicants filed an emergency application to stay the three-judge court's order declaring unconstitutional North Carolina's legislatively-created congressional map on Equal Protection, First Amendment, and Election's Clause grounds.² This ruling, which comes 34 days before North Carolina's candidacy filing period opens, four months before North Carolina's primary elections, and less than ten months before 2018's general elections, threatens to upend the regularly scheduled election process of North Carolina.

The District Court ordered that the legislature present it with remedial maps by 5 p.m. on January 29, 2018, a deadline that, absent summary reversal, will likely come and go before this Court has time to resolve the petitioners' pending appeal of the district court's decision. Accordingly, left unstayed, the district court's remedial order will force Amici Members to devote considerable resources to reaching different voters, campaigning in different districts, and fundraising from different areas. Further, in reasonable anticipation of the 2018 election cycle, and in reliance upon the existing congressional maps, the Amici Members have been spending time, receiving and expending valuable resources in furtherance of their respective campaigns. Similarly, the citizens of North Carolina who have been contributing to and volunteering with congressional campaigns in their district may live in different

² Compare Ex. A, *Common Cause v. Rucho*, No. 16-1026 (M.D.N.C. 2017) (three-judge court (Defs.' Trial Ex. 5012) (North Carolina's 1992 congressional map that was upheld) *with* (Ex. B) (Defs.' Trial Ex. 1001) (North Carolina's current congressional map that the three-judge panel declared unconstitutional).

districts under a new plan. If this Court does not stay or summarily reverse the district court's decision, many of the resources that Amici Members and the citizens of North Carolina expended in reasonable anticipation of the 2018 election will be wasted on campaigning in what might become incorrect congressional districts. Moreover, in the absence of a stay from this Court, the decision to North Carolina's congressional districts only a few weeks before the primary election filing period will disadvantage candidates who lack substantial monetary resources, regardless of their party affiliation.

Granting a stay will allow Amici Members to continue to reach their current constituency, avoiding wasting valuable campaign resources and disadvantaging candidates who currently have less resources on-hand. Similarly, granting a stay will allow North Carolina constituents to continue contributing to and supporting their existing members of congress without waste and uncertainty while this Court considers the merits of the decision below. Accordingly, Amici Members respectfully ask this Court to grant the stay application while this Court resolves the disposition of the appeal.

I. IF THIS COURT DOES NOT GRANT A STAY, CONGRESSIONAL CANDIDATES IN NORTH CAROLINA WILL SUFFER IRREPARABLE HARM BY THEIR PREVIOUS RELIANCE ON THE DISTRICT MAPS.

Without a stay of the decision below, Amici Members will suffer irreparable harm due to their now obsolete and defunct campaign resource allocations. Amici Members are incumbents who currently represent districts within the state of North

Carolina and who are currently campaigning for reelection. Amici Members, and many other congressional candidates, have long been campaigning in anticipation of the 2018 election. Many candidates challenging the Amici Members for the 2018 election have already announced their campaigns.³ In addition, media and opposition campaigns have already been unleashed against congressional incumbents by various political groups and activists, including Democrats.⁴ The campaign committees of Amici Members have already raised over \$6.5 Million in an effort to win the 2018 Election. Accordingly, in running for their respective congressional seats, each Member has invested substantial time, effort, and/or money.

Amici Members' personal efforts, activities, duties, and stakes in their congressional candidacies are well underway. These activities require knowing with certainty the geographic parameters of congressional districts with sufficient lead time to permit Members to develop a campaign strategy that is tailored to the needs of the unique voters in their district. The decision to undertake such investment was

³ For example, six candidates—four Democrats, one Republican, and one Independent, have announced their bids to challenge Representative George Holding in the 2nd District. See <http://www.newsobserver.com/news/politics-government/politics-columns-blogs/under-the-dome/article176524791.html>; <http://www.newsobserver.com/news/politics-government/politics-columns-blogs/under-the-dome/article160302209.html>; <http://www.newsobserver.com/news/politics-government/state-politics/article152678114.html>; <http://www.newsobserver.com/news/politics-government/politics-columns-blogs/under-the-dome/article174181041.html>; <http://www.newsobserver.com/news/politics-government/politics-columns-blogs/under-the-dome/article174110856.html>; <https://www.crowdpac.com/campaigns/266084/timmy-strickland>.

⁴ See <http://www.newsobserver.com/news/politics-government/politics-columns-blogs/under-the-dome/article183559236.html>; <http://www.newsobserver.com/news/politics-government/politics-columns-blogs/under-the-dome/article166196442.html>.

based in no small part on the existing boundaries of the Members' respective congressional districts. In fact, the district boundaries were a critical factor in making decisions about each candidacy. A change in congressional districts before the 2018 elections could threaten some of Amici Members' candidacies for Congress because they may no longer live in their districts, they may be paired with another incumbent, or a new district could geographically or demographically favor a primary opponent.

To believe, as the lower court and plaintiffs seem to indicate, that the completion of a new congressional map prior to the filing deadline in any way mitigates the harm to Amici Members, other congressional candidates, and the electoral process of North Carolina is not only clearly erroneous but is also both unrealistic and uninformed. With congressional terms lasting only two years, the next election cycle does not begin with the state filing deadline, which is only two months before North Carolina's primary election and seven months before the general election—it begins almost immediately after the previous general election.⁵ The Amici Members—indeed nearly all congressional candidates in the state—have been relying on the existing congressional map for over a year in making campaign and election related decisions regarding the 2018 election.

The courts have repeatedly held that upending political geography in the midst

⁵ Every Republican incumbent congressional candidate from North Carolina has filed their Statement of Candidacy with the FEC for 2018 nearly a year ago: George Holding, filed 2/2/17, 2nd District; Walter Jones, Jr., filed 2/7/17, 3rd District; Virginia Foxx, filed 11/17/16, 5th District; Mark Walker, filed 2/2/17, 6th District; David Rouzer, filed 12/8/16, 7th District; Richard Hudson, filed 1/11/17, 8th District; Robert Pittenger, filed 1/26/17, 9th District; Patrick McHenry, filed 1/30/17, 10th District; Mark Meadows, filed 2/3/17, 11th District; Ted Budd, filed 3/5/17, 13th District. *See* FEC, New Statements of Candidacy, <http://classic.fec.gov/data/Form2Filer.do?format=html> , accessed on 1/13/17.

of elections can cause harm through the disruption of the political process, especially as the election approaches. *See Purcell v. Gonzalez*, 549 U.S. 1 (2006); *Reynolds v. Sims*, 377 U.S. 533, 585 (1964) (“In awarding or withholding immediate relief, a court is entitled to and should consider the proximity of a forthcoming election and the mechanics and complexities of state election laws, and should act and rely upon general equitable principles. With respect to the timing of relief, a court can reasonably endeavor to avoid a disruption of the election process which might result from requiring precipitate changes that could make unreasonable or embarrassing demands on a State in adjusting to the requirements of the court's decree.”); *See Williams v. Rhodes*, 393 U.S. 23, 35, 89 (1968) (finding last-minute addition to ballot would pose “a risk of interference with the rights of other [citizens], for example, absentee voters”).

In the present case, now that the 2018 election cycle is well underway, a judicially ordered redistricting for the 2018 congressional elections—especially before this Court has had an opportunity to review the decision of the district court—would result in “[s]erious disruption of orderly . . . election processes.” *Butcher v. Bloom*, 415 Pa. 438, 477 (Pa. 1964). Not only will Amici Members have allocated resources directed towards voters who no longer reside in the same district (and therefore may no longer be potential constituents or supporters), they will have to expend additional resources to reach new voters who now reside in the new districts. Of course, if this Court does not grant this stay and subsequently reverses the district court’s decision, even more waste and harm will occur because campaigns will have reached out to

new voters—who upon reversal no longer reside in those districts—while potentially ceasing to reach out to voters who had their districts switched and who reside in the original districts again. Because of this overwhelming potential for harm, Amici Members respectfully request this Court grant the stay application pending the Court’s determination of whether to note probable jurisdiction.

II. IF THIS COURT DOES NOT GRANT A STAY, CANDIDATES WITH LESS RESOURCES WILL BE SEVERELY AND DISPROPORTIONATELY DISADVANTAGED, REGARDLESS OF THEIR PARTY AFFILIATION.

Without a stay of the decision below, congressional candidates who currently lack large on-hand cash balances in their campaign accounts will be disproportionately disadvantaged, regardless of their party affiliation. Effectuating a profound change in the political geography of North Carolina only weeks before the primary filing deadline, would force congressional candidates to expend significant funds in order to reach new constituents while simultaneously depriving them of the necessary time to raise those funds. This will clearly harm candidates who possess less liquid resources than their opponents.

As previously discussed, congressional candidates have been expending resources in anticipation of the 2018 elections for some time. This resource allocation has been carefully targeted to reach potential supporters in each congressional district. If North Carolina’s congressional districts are changed, every candidate will have to expend additional campaign resources in order to reach new potential supporters and voters. These changes will result in candidates expending substantial

resources without time to fundraise, given the fast approaching primary filing deadline. The resulting net loss in campaign funds will disproportionately disadvantage and harm candidates who do not currently possess many resources while advantaging candidates who have amassed large campaign war-chests.

Moreover, given the time constraints and proximity to filing deadlines, more expensive methods of campaign communication would have to be utilized in order to reach voters who are new to congressional districts. Grassroots efforts such as community organizing, door knocking, volunteer phone banking, canvassing, and barnstorming generally require candidates to expend less money, but require much more time. Given the district court's order, candidates will be forced to utilize more expensive—and less direct—means of voter outreach such as paid robo-calls and advertisement through television, internet, radio, and print. The lack of direct voter contact from campaigns will not only fundamentally undermine the direct constituent involvement in the political process that the district court seeks to remedy in its order, but will place a much greater strain on cash-strapped campaigns than on campaigns with large resources currently at their disposal.

Therefore, without a stay from this Court, the district court's order will have a profound impact on campaigns that may lack the resources to adjust to such a change quickly. This disparate harm will be felt by campaigns regardless of partisan affiliation or incumbency status. Accordingly, Amici Members respectfully request this Court grant the stay application, while this Court considers disposition of the appeal.

III. WITHOUT A STAY, THE CITIZENS OF NORTH CAROLINA WHO HAVE ENGAGED IN THE POLITICAL PROCESS WILL SUFFER HARM BY THE CREATION OF ANY INTERIM CONGRESSIONAL MAP.

Without a stay of the decision below, the citizens of North Carolina will suffer irreparable harm due to their involvement in the political process. Just as Amici Members have been raising and expending funds in efforts to win the 2018 election, the citizens of North Carolina have been contributing to and volunteering with Congressional candidates in anticipation of the 2018 election. These citizens have supported these representatives in reliance on the existing congressional map. Much of this support may not have been pledged if the contributor resided in a different district than the candidate or if a candidate was not likely to be successful in the 2018 elections. The decisions to undertake this support were based in no small part on the existing boundaries of the congressional districts.

A change in congressional districts before the 2018 elections will likely result in contributors being represented by different representatives than the ones to whom they originally contributed. Many citizens will surely be harmed by this kind of situation because when pledging their support they wished to support a Member who had the potential to represent them in congress for yet another term. Essentially, these contributors relied on the existing congressional map when engaging in the political process, and a change to that map prior to the 2018 election, especially before this court has had an opportunity to review the decision of the lower court, will certainly cause irreparable harm through the misallocation of campaign

contributions.

Moreover, a complete upheaval of the regularly scheduled election processes of North Carolina, without this Court having the opportunity to review the decision, will certainly have a chilling effect on contributor's willingness to provide funds. As this Court stated in *Buckley v. Valeo*, "Given the important role of contributions in financing political campaigns, contribution restrictions could have a severe impact on political dialogue if the limitations prevented candidates and political committees from amassing the resources necessary for effective advocacy." 424 U.S. 1, 21 (1976). The three-judge panel's order to draw remedial maps is bound to "result in voter [and contributor] confusion and consequent incentive to remain away from the polls." *Purcell v. Gonzalez*, 549 U.S. 1, 4-5 (2006).

Thus, in addition to the voter confusion that would undoubtedly take place given the creation of any interim map (as noted in Applicants' Motion for Stay), the citizens of North Carolina who are already involved in the political process through contribution and volunteering will be harmed. A grant of stay by this Court will avoid the resulting unnecessary and irreparable harm by removing the potential for uncertainty, wastefulness, and hesitancy. Accordingly, Amici Members respectfully request this Court grant the stay application, while this Court considers disposition of the appeal.

CONCLUSION

For the foregoing reasons, this Court should issue a stay of all proceedings before the three-judge panel in the U.S. District Court for the Middle District of

North Carolina pending this Court's disposition of Applicants' Jurisdictional Statement.

Respectfully submitted on this 16th day in January, 2018,



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EXHIBIT A

1992 Congressional Base Plan #10

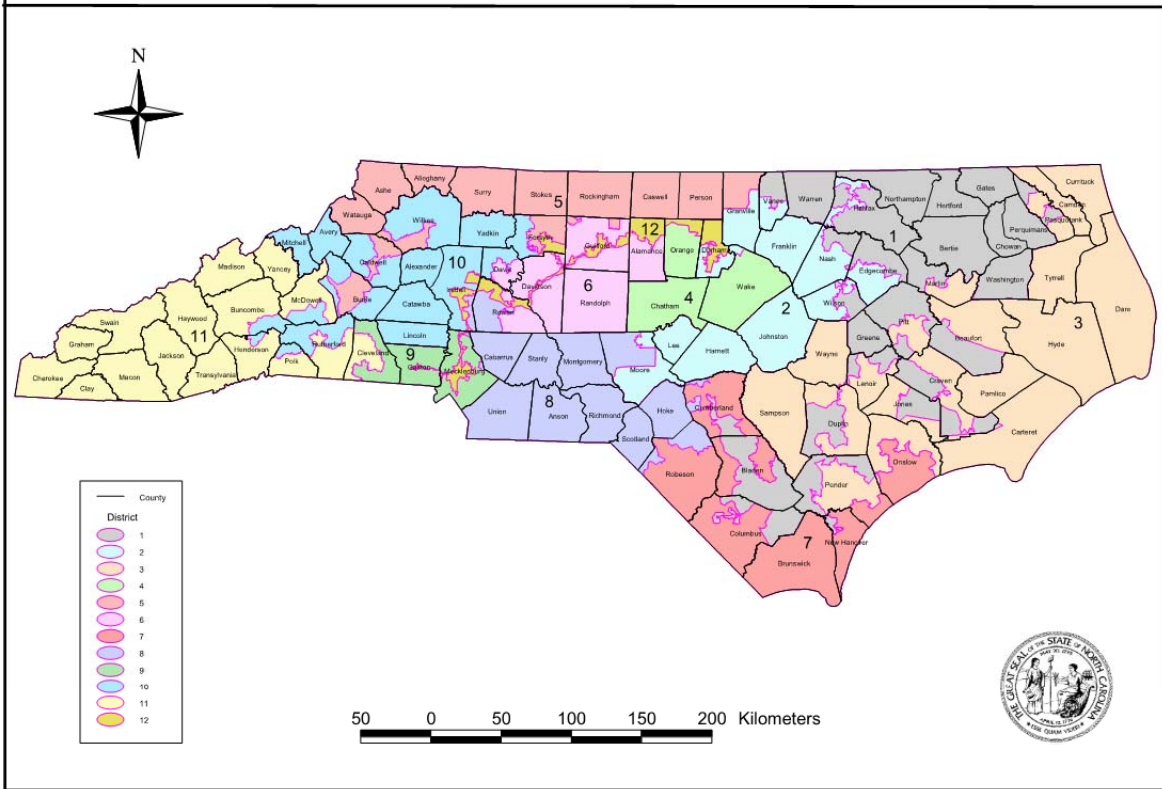
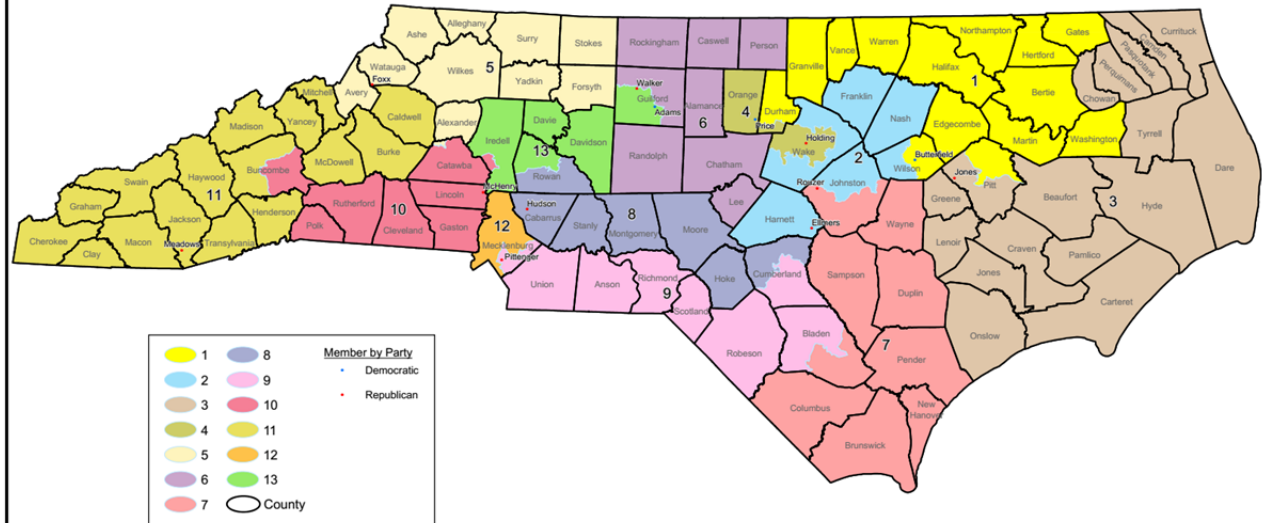


EXHIBIT B

2016 Contingent Congressional Plan - Corrected



2015 Regular Session

0 25 50 100 150 200 Miles

Printed by the NC General Assembly, February 18, 2016.

EXHIBIT

1001

1:16-CV-1026

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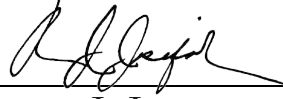
I, Thomas J. Josefiak, a member of the Supreme Court Bar, hereby certify that three copies of the attached Amicus Brief and Motions in support of Applicants' Emergency Application for Stay, filed by hand-delivery to the United States Supreme Court, were served via Next-Day Service and on the following parties listed below on this 16th day of January, 2018. An electronic pdf of the Application has been sent to the following counsel via e-mail:

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