

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF KANSAS**

LEAGUE OF UNITED LATIN AMERICAN)	
CITIZENS, KANSAS, ALEJANDRO)	
RANGEL-LOPEZ,)	
)	
Plaintiffs,)	Civil Action No.: 2:18-cv-02572-DDC
)	
vs.)	
)	
DEBORAH COX, FORD COUNTY CLERK, in)	
her official capacity,)	
)	
Defendant.)	
)	

PLAINTIFFS’ VOLUNTARY MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs League of United Latin American Citizens (“LULAC”) and Alejandro Rangel-Lopez move this Court to dismiss the above-captioned cause without prejudice under Federal Rule of Civil Procedure 41(a)(2).

1. In their Complaint, Plaintiffs have alleged that Defendant Cox violated the Fourteenth Amendment of the Constitution and Section 2 of the Voting Rights Act by: (1) maintaining a single polling location for 13,000 people; and (2) limiting in-person voting to a single, inaccessible polling location.

2. Following the November 2018 election and in her initial memorandum supporting her motion to dismiss, Defendant Cox stated that she had no plans to open an additional polling location in 2019. Further, while she indicated use of the Expo Center was temporary, Defendant Cox had not announced where voters would be assigned while the former permanent polling location was under construction.

3. On January 22, 2019, Defendant announced a concrete, specific plan to open two polling locations for the City of Dodge City, both of which are accessible to the public.
4. Upon review of Defendant's announcement and given the changed factual circumstances underlying Plaintiffs' allegations and position in response to Defendant's motion to dismiss, Plaintiffs have determined that they wish to voluntarily dismiss their complaint pursuant to Fed. R. Civ. P 41(a)(2),
5. This case is in its early stages, and the Defendant will not be prejudiced by this dismissal.
6. Plaintiffs similarly will not be harmed by this voluntary dismissal without prejudice.

WHEREFORE, Plaintiffs respectfully request that this Court dismiss without prejudice their Complaint.

Respectfully submitted,

/s/ Lauren Bonds

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that on January 25, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notifications of such filing to the e-mail addresses of all counsel of record.

/s/ Lauren Bonds
Lauren Bonds