

IN THE SUPREME COURT OF APPEALS  
STATE OF WEST VIRGINIA

NOV 4 2011

NO. 11-1405

STATE OF WEST VIRGINIA ex rel. THORNTON COOPER.

Petitioner,

VS.

NATALIE E. TENNANT,  
Secretary of State of the State of West Virginia

Respondent.

**MOTION OF  
WEST VIRGINIA AFL-CIO and  
WEST VIRGINIA CITIZENS ACTION GROUP  
TO FILE *AMICI CURIAE* BRIEF**

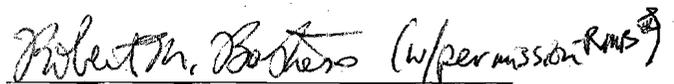
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Counsel For *Amici Curiae*

By counsel, the West Virginia AFL-CIO and the West Virginia Citizens Action Group move for permission of the Court to file an *amici curiae* brief in the above-captioned matter to present their opposition on constitutional and other grounds opposing any judicially-mandated redistricting plan that creates statewide single-member districts for the West Virginia House of Delegates.

#### STATEMENT OF INTERESTS

The West Virginia AFL-CIO is a labor organization consisting of member unions representing the interests of working people in the State of West Virginia. The West Virginia Citizens Action Group is a grass roots organization that promotes equal rights for all and a fair and just society. Both *amici* have consistently advocated for clean and effective government, fair representation in and meaningful access to the political process for all citizens, fair and clean elections, and have done so through use of the public forum and through advocacy in legislative, executive, and judicial fora. *Amici* contend that strict reliance on single-member districts in West Virginia's House of Delegates would threaten their interests, stated above, and would run counter to the history and tradition in West Virginia in the election of Delegates.



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CERTIFICATE OF SERVICE

I have mailed a copy of the foregoing motion to the petitioner, Thornton Cooper, 3015 Ridgeview Drive, South Charleston, W. Va. 25303, and to counsel for respondent, Darrel V. McGraw and Thomas Rodd, Office of the Attorney General, Room 26-E, State Capitol, Charleston, W. Va. 25305, on this the 4<sup>th</sup> day of November, 2011.

Robert M. Bosters (w/permission - FOMB)