

SUPREME COURT OF NORTH CAROLINA

\*\*\*\*\*

NORTH CAROLINA LEAGUE OF )  
CONSERVATION VOTERS, INC., )  
et al., )

COMMON CAUSE )

v. )

REPRESENTATIVE DESTIN )  
HALL, in his official capacity as )  
Chair of the House Standing )  
Committee on Redistricting, et al. )

From Wake County

21 CVS 015426

21 CVS 500085

---

REBECCA HARPER, et al., )

COMMON CAUSE )

v. )

REPRESENTATIVE DESTIN )  
HALL, in his official capacity as )  
Chair of the House Standing )  
Committee on Redistricting, et al. )

\*\*\*\*\*  
**MOTION FOR LEAVE FOR ZACHARY CHARLES SCHAUF  
TO WITHDRAW AS COUNSEL OF RECORD  
FOR NCLCV PLAINTIFFS**  
\*\*\*\*\*

Counsel Zachary C. Schauf, who currently represents Plaintiffs North Carolina League of Conservation Voters Inc., et al. (“NCLCV Plaintiffs”), pursuant to North Carolina Rules of Appellate Procedure 33(a), moves the Court to grant him leave to withdraw as counsel of record. The grounds for this are as follows:

1. As of November 11, 2022, Mr. Schauf will be leaving Jenner & Block LLP to serve as Deputy Assistant Attorney General in the U.S. Department of Justice, Office of Legal Counsel.

2. Mr. Schauf’s clients, the NCLCV Plaintiffs, have been notified and consent to this withdrawal.

3. The law firm of Robinson, Bradshaw & Hinson, P.A. will continue to serve as counsel of record through John R. Wester, Adam K. Doerr, Stephen D. Feldman, and Erik R. Zimmerman, and the law firm of Jenner & Block LLP will continue to serve as counsel of record through Sam Hirsch, Jessica Ring Amunson, Karthik P. Reddy, and Urja Mittal.

4. The other Plaintiffs and Defendants in this case—Plaintiffs Rebecca Harper et al., Plaintiff Common Cause, the Legislative Defendants, and the State Defendants—have been informed and consent to this withdrawal.

5. The withdrawal will not have any effect on the appeals in these cases, which have been fully briefed and argued.

WHEREFORE, Zachary C. Schauf respectfully requests that the Court grant him leave to withdraw as counsel of record and such other and further relief as the Court deems just and proper.

Respectfully submitted this 11th day of November, 2022.

**ROBINSON, BRADSHAW & HINSON, P.A.**

Electronically Submitted

Stephen D. Feldman

North Carolina Bar No. 34940

434 Fayetteville Street, Suite 1600

Raleigh, NC 27601

(919) 239-2600

sfeldman@robinsonbradshaw.com

N.C. R. App. 33(b) Certification: I certify that all of the attorneys listed below have authorized me to list their names on this document as if they had personally signed it:

John R. Wester

North Carolina Bar No. 4660

Adam K. Doerr

North Carolina Bar No. 37807

ROBINSON, BRADSHAW & HINSON, P.A.

101 North Tryon Street

Suite 1900

Charlotte, NC 28246

(704) 377-2536

jwester@robinsonbradshaw.com

adoerr@robinsonbradshaw.com

Erik R. Zimmerman  
North Carolina Bar No. 50247  
ROBINSON, BRADSHAW & HINSON, P.A.  
1450 Raleigh Road, Suite 100  
Chapel Hill, NC 27517  
(919) 328-8800  
ezimmerman@robinsonbradshaw.com

**JENNER & BLOCK LLP**

Sam Hirsch\*  
Jessica Ring Amunson\*  
Zachary C. Schauf\*  
Karthik P. Reddy\*  
Urja Mittal\*  
JENNER & BLOCK LLP  
1099 New York Avenue NW  
Suite 900  
Washington, D.C. 20001  
(202) 639-6000  
shirsch@jenner.com  
zschauf@jenner.com

\*Admitted pro hac vice

*Counsel for NCLCV Plaintiffs*

**CERTIFICATE OF SERVICE**

Pursuant to Rule 26 of the North Carolina Rules of Appellate Procedure, I hereby certify that the foregoing document has been filed with the Clerk of the North Carolina Supreme Court by electronic submission. I further certify that a copy of this document has been duly served upon the following counsel of record by email:

Burton Craige  
Narendra K. Ghosh  
Paul E. Smith  
Patterson Harkavy LLP  
100 Europa Drive, Suite 420  
Chapel Hill, NC 27517  
bcraige@pathlaw.com  
nghosh@pathlaw.com  
psmith@pathlaw.com

Lalitha D. Madduri  
Jacob D. Shelly  
Graham W. White  
Elias Law Group LLP  
10 G Street NE, Suite 600  
Washington, DC 20002  
lmadduri@elias.law  
jshelly@elias.law  
gwhite@elias.law

Abha Khanna  
Elias Law Group LLP  
1700 Seventh Avenue, Suite 2100  
Seattle, WA 98101  
akhanna@elias.law

Phillip J. Strach  
Thomas A. Farr  
John E. Branch III  
Alyssa M. Riggins  
Nelson Mullins Riley &  
Scarborough LLP  
4140 Parklake Avenue, Suite 200  
Raleigh, NC 27612  
phillip.strach@nelsonmullins.com  
tom.farr@nelsonmullins.com  
john.branch@nelsonmullins.com  
alyssa.riggins@nelsonmullins.com

Mark E. Braden  
Katherine McKnight  
Baker Hostetler LLP  
1050 Connecticut Avenue NW,  
Suite 1100  
Washington, DC 20036  
mbraden@bakerlaw.com  
kmcknight@bakerlaw.com

*Counsel for Defendants*  
*Representative Destin Hall, Senator*  
*Warren Daniel, Senator Ralph E.*  
*Hise, Jr., Senator Paul Newton,*  
*Representative Timothy K. Moore,*  
*and Senator Phillip E. Berger*

Elisabeth S. Theodore  
R. Stanton Jones  
John Cella  
Samuel F. Callahan  
Arnold and Porter Kaye Scholer LLP  
601 Massachusetts Avenue NW  
Washington, DC 20001-3743  
elisabeth.theodore@arnoldporter.com  
stanton.jones@arnoldporter.com  
john.cella@arnoldporter.com  
samuel.callahan@arnoldporter.com

*Counsel for Plaintiffs Rebecca  
Harper, et al.*

---

Allison J. Riggs  
Hilary H. Klein  
Mitchell Brown  
Katelin Kaiser  
Jeffrey Loperfido  
Noor Taj  
Southern Coalition for Social Justice  
1415 W. Highway 54, Suite 101  
Durham, NC 27707  
allison@southerncoalition.org  
hilaryhklein@scsj.org  
mitchellbrown@scsj.org  
katelin@scsj.org  
jeffloperfido@scsj.org  
noor@scsj.org

J. Tom Boer  
Olivia T. Molodanof  
Hogan Lovells US LLP  
3 Embarcadero Center, Suite 1500  
San Francisco, CA 94111  
tom.boer@hoganlovells.com  
olivia.molodanof@hoganlovells.com

*Counsel for Plaintiff Common Cause*

---

Terence Steed  
Stephanie Brennan  
Amar Majmundar  
N.C. Department of Justice  
Post Office Box 629  
Raleigh, NC 27502-0629  
tsteed@ncdoj.gov  
sbrennan@ncdoj.gov  
amajmundar@ncdoj.gov

*Counsel for Defendants the North  
Carolina State Board of Elections,  
Damon Circosta, Stella Anderson,  
Jeff Carmon III, Stacy Eggers IV,  
Tommy Tucker, Karen Brinson Bell;  
and the State of North Carolina*

This the 11th day of November, 2022.

Electronically Submitted

Stephen D. Feldman

Robinson, Bradshaw & Hinson, P.A.

*Attorney for NCLCV Plaintiffs*