

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA**

Plaintiffs

*in his official capacity
as Secretary of State of Alabama*

Defendant

Case No.: _____

**COMPLAINT FOR INJUNCTIVE AND
DECLARATORY RELIEF**

INTRODUCTION

et seq.

et seq

JURISDICTION AND VENUE

FACTUAL BACKGROUND

Use of Accessible Electronic Documents by the Blind and Print Disabled Individuals

See also, e.g

The Absentee Ballot Process in Alabama

Mechanisms are Available to Provide Accessible Absentee Ballots.

**Alabama Offers Electronic Ballots to Overseas and Military Voters but
Has Refused to Provide Them to Blind and Print Disabled Voters**

Id.

Id.

Id.

Id.

Id.

See

See Id

See

Id.

id.

id.

PRAYER FOR RELIEF

WHEREFORE

/s/ William Van Der Pol

Counsel for Plaintiffs

Pro Hac Vice