

Nos. 19-1257 & 19-1258

IN THE

# Supreme Court of the United States

,  
v. , et al.,  
Petitioners ,

v.

, et al.,  
Respondents.



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ARGUMENT

- I. SECTION 2 HAS A VITAL CONTINUING ROLE IN PROTECTING MINORITY VOTERS• EQUAL ACCESS TO THE



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also m , Purges 1-3, - , supra see  
We Go from Here,  
& m ( . 30, 2020), // . /35 .  
- m m  
to Vote 12, . , Waiting  
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B. Recent Attacks On The Right To Vote Dis-  
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II. THIS COURT SHOULD CONTINUE TO INTERPRET SECTION 2 TO EMPOWER COURTS TO PROTECT AGAINST THE PERSISTENT AND ADAPTIVE PROBLEM OF DISCRIMINATION IN VOTING

A. For Generations, This Court Has Protected Democracy By Striking Down Barriers To Participation

Brown v. Board of Education, 347 U.S. 483 (1954).  
 See, e.g., Nixon v. Herndon, 233 U.S. 53 (1912).  
 See, e.g., the State Action Doctrine, 1940-1990 35 & 23, 2 (2010).  
 See, e.g., Id. 541.



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Gomillion , Baker . Carr,

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CONCLUSION

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# APPENDIX

**APPENDIX: LIST OF AMICI**

ACCESS

Advancement Project National Office

American Federation of Labor and Congress of  
Industrial Organizations

Andrew Goodman Foundation

Anti-Defamation League (ADL)

Asian & Pacific Islander American Health Forum

Asian Americans Advancing Justice

Black Alliance for Just Immigration

Central Conference of American Rabbis

Clean Elections Texas

Common Cause

Communications Workers of America

Demos

End Citizens United / Let America Vote Action Fund

Fair Count Inc

Generation Vote

Government Accountability Project

Hispanic Federation

Justice for Migrant Women

Lambda Legal

League of Women Voters United States

Matthew Shepard Foundation

Men of Reform Judaism

2a

Mid-Ohio Valley Climate Action

NARAL Pro-Choice America

National Alliance for Partnerships in Equity (NAPE)

3a

Union for Reform Judaism

Union of Concerned Scientists

Women Lawyers on Guard Inc.

Women of Reform Judaism

Youth Progressive Action Catalyst