

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

TATI ABU KING *and* TONI HEATH JOHNSON,

Plaintiffs,

v.

JOHN O'BANNON, *in his official capacity as Chairman of the State Board of Elections for the Commonwealth of Virginia*; ROSALYN R. DANCE, *in her official capacity as Vice Chair of the State Board of Elections for the Commonwealth of Virginia*; GEORGIA ALVIS-LONG, *in her official capacity as Secretary of the State Board of Elections for the Commonwealth of Virginia*; DONALD W. MERRICKS, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; MATTHEW WEINSTEIN, *in his official capacity as a member of the State Board of Elections for the Commonwealth of Virginia*; SUSAN BEALS, *in her official capacity as Commissioner of the Department of Elections for the Commonwealth of Virginia*; ERIC SPICER, *in his official capacity as the General Registrar of Fairfax County, Virginia*; and SANDY C. ELSWICK, *in her official capacity as the General Registrar of Smyth County, Virginia,*

Defendants.

SO ORDERED

U.S.D.J.

Date: *J. J. J.*
28 April 2026

Case No. 3:23-cv-00408 (JAG)

PARTIES' JOINT STIPULATION TO EXTEND IMPLEMENTATION DEADLINE

Defendants and the Plaintiff Class, by and through counsel, submit this Joint Stipulation and request that the Court enter the accompanying proposed order extending the deadline for Defendants' technical and administrative implementation of the Court's January 22, 2026 Final Order (the "Final Order") (ECF No. 223) from May 1, 2026, to June 1, 2026. In support, the parties state as follows:

1. On January 22, 2026, the Court entered a Final Order granting Plaintiffs' motion for summary judgment and permanent injunctive relief; certifying a statewide class; declaring that Defendants have violated the Virginia Readmission Act; and ordering that, by May 1, 2026, Defendants shall not deny any person attempting to register to vote or cancel any person's existing voter registration, except for convictions of offenses that constituted the eleven enumerated crimes that were felonies at common law in 1870.

2. Since entry of the Final Order, the parties have been engaged in discussions regarding Defendants' implementation of the Court's Order.

3. Defendants have agreed to provide Class Counsel with a draft list of offenses that Defendants contend constitute disqualifying Virginia convictions under the Final Order by May 1. The parties are meeting and conferring on that list.

4. Defendants are undertaking steps to implement the Final Order, including rebuilding the voter registration system's "prohibited table" to include only those individuals who are disenfranchised based on conviction for a disqualifying felony under the Final Order, updating voter-registration forms and voter education materials, modifying the Virginia Election and Registration Information System (VERIS) so that it will not block or cancel registrations in violation of the Final Order.

5. Defendants are continuing work to complete all necessary technical and administrative updates to VERIS (including rebuilding the prohibited table), to coordinate with relevant government agencies regarding conviction data, to finalize the list of disqualifying Virginia convictions, and to prepare and distribute guidance for election officials, potentially-impacted voters, and the public (including guidance addressing application of the Final Order to federal and out-of-state convictions).

6. The parties jointly submit that certain technical and administrative challenges require a limited amount of additional time to complete implementation of the Final Order in a manner that minimizes confusion among voters and election officials and ensures accurate administration consistent with federal law.

Dated: April 28, 2026

Respectfully submitted,

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on April 28, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically e-mail notification of such filing to all counsel of record.

/s/ Brittany Blueitt Amadi
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