

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**THE NATIONAL FEDERATION
OF THE BLIND OF VIRGINIA, *et al.*,**

Plaintiffs,

Case No. 3:23-cv-127-HEH

v.

**VIRGINIA DEPARTMENT OF
CORRECTIONS, *et al.*,**

Defendants.

**PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT
AGAINST DEFENDANTS CHADWICK DOTSON, BARRY MARANO,
DARRELL MILLER, KEVIN MCCOY, LAKEISHA SHAW, AND
THE VIRGINIA DEPARTMENT OF CORRECTIONS**

Pursuant to Federal Rule of Civil Procedure 56, Local Rule 56, and Pre-trial Schedule A (ECF No. 74-1), Plaintiffs National Federation for the Blind, Nacarlo Courtney, William Hajacos, Michael McCann, Kevin Muhammad Shabazz, Patrick Shaw, and William Stravitz, by counsel, respectfully move this Court for an order granting Plaintiffs' Motion for Partial Summary Judgment on their claims under the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, and the Virginians with Disabilities Act. Grounds for this Motion is set forth in the accompanying Memorandum and the exhibits and declarations submitted thereto; the complete files and records of this action; the argument of counsel; and such other material as may be presented by Plaintiffs.

Dated: February 23, 2024

Respectfully submitted,

/s/ Eve L. Hill

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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of February, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (“NEF”) to the following:

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