

# **EXHIBIT**

**2**

**UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF NORTH CAROLINA**

STUDENTS FOR FAIR ADMISSIONS,  
INC.,

Plaintiff,

v.

THE UNIVERSITY OF NORTH  
CAROLINA AT CHAPEL HILL, et al.,

Defendants.

Civil Action No. 1:14-cv-954-LCB-JLW

**PROPOSED ANSWER OF DEFENDANT-INTERVENORS**

Defendant-Intervenors, Angie and Kevin Mills on behalf of Q.M.; Christopher Jackson on behalf of C.J.; Julia Nieves on behalf of I.N.; Tamika Williams on behalf of A.J.; and Ramonia Jones on behalf of R.J., Cecilia Polanco, Luis Acosta, Laura Ornelas, and Star Wingate-Bey (collectively, “Defendant-Intervenors”), by their undersigned attorneys, hereby answer the Complaint filed by the Plaintiff in the above-styled action as follows:

Defendant-Intervenors deny each and every averment of the Complaint except as specifically admitted in the following response to the enumerated paragraphs of the Complaint:

1. Paragraph 1 states conclusions of law and Plaintiff’s characterization of its claims, to which no response is required. To the extent a response is required, Defendant-

Intervenors deny the allegations in paragraph 1.

2. Paragraph 2 states conclusions of law to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 2.
3. Paragraph 3 states conclusions of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 3.
4. Paragraph 4 states conclusions of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 4.
5. Defendant-Intervenors deny the allegations in paragraph 5, except to the extent that they contain conclusions of law, to which no response is required.
6. Defendant-Intervenors deny the allegations in paragraph 6, except to the extent that they contain conclusions of law, to which no response is required.
7. Defendant-Intervenors deny the allegations in paragraph 7, except to the extent that they contain conclusions of law, to which no response is required.
8. Defendant-Intervenors admit that Plaintiff has brought this action under the Fourteenth Amendment to the U.S. Constitution, 42 U.S.C. § 1983, and 42 U.S.C. § 2000d *et seq.* Defendant-Intervenors deny that this Court has subject matter jurisdiction over the action pursuant to 28 U.S.C. §§ 1331 & 1343.

Defendant-Intervenors further state upon information and belief that Plaintiff's

claims arising under Section 1981 have been dismissed pursuant to the filing of a Joint Stipulation of Dismissal on March 20, 2015.

9. Defendant-Intervenors admit that venue is proper in the Middle District of North Carolina, as alleged in paragraph 9.
10. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 10 and therefore deny those allegations.
11. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 11 and therefore deny those allegations.
12. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 12 and therefore deny those allegations.
13. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 13 and therefore deny those allegations.
14. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 14 and therefore deny those allegations.
15. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 15 and therefore deny those

allegations.

16. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 16 and therefore deny those allegations.
17. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 17 and therefore deny those allegations.
18. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 18 and therefore deny those allegations.
19. Defendant-Intervenors deny the allegations in paragraph 19.
20. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 20 and therefore deny those allegations.
21. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 21 and therefore deny those allegations.
22. Defendant-Intervenors deny the allegations in paragraph 22.
23. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 23 and therefore deny those allegations.

24. Defendant-Intervenors deny the allegations in paragraph 24.
25. Defendant-Intervenors admit the allegations in paragraph 25.
26. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 26 and therefore deny those allegations, except to the extent that they contain conclusions of law, to which no response is required.
27. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 27 and therefore deny those allegations.
28. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 28 and therefore deny those allegations.
29. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 29 and therefore deny those allegations.
30. Defendant-Intervenors admit the allegations in paragraph 30.
31. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 31 and therefore deny those allegations.
32. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 32 and therefore deny those

allegations.

33. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 33 and therefore deny those allegations.
34. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 34 and therefore deny those allegations.
35. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 35 and therefore deny those allegations.
36. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 36 and therefore deny those allegations.
37. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 37 and therefore deny those allegations.
38. Defendant-Intervenors admit the allegations in paragraph 38.
39. Defendant-Intervenors deny the allegations in paragraph 39 to the extent those allegations characterize or base claims upon the content of the Common Application.
40. Defendant-Intervenors deny the allegations in paragraph 40 to the extent those

allegations characterize or base claims upon the content of the Common Application.

41. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 41 and therefore deny those allegations.
42. Defendant-Intervenors admit on information and belief that the University of North Carolina at Chapel Hill has two application deadlines for admission, but otherwise lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 42 and therefore deny those allegations.
43. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 43 and therefore deny those allegations.
44. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 44 and therefore deny those allegations.
45. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 45 and therefore deny those allegations.
46. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 46 and therefore deny those allegations.



47. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 47 and therefore deny those allegations.
48. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 48 and therefore deny those allegations.
49. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 49 and therefore deny those allegations.
50. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 50 and therefore deny those allegations.
51. Defendant-Intervenors deny the allegations in paragraph 51.
52. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 52 and therefore deny those allegations.
53. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 53 and therefore deny those allegations.
54. Defendant-Intervenors deny the allegations in paragraph 54.
55. Defendant-Intervenors lack knowledge or information sufficient to form a belief

about the truth of the allegations in paragraph 55 and therefore deny those allegations.

56. Defendant-Intervenors deny the allegations in paragraph 56.
57. Defendant-Intervenors deny the allegations in paragraph 57.
58. Defendant-Intervenors deny the allegations in paragraph 58.
59. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 59 and therefore deny those allegations.
60. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 60 and therefore deny those allegations.
61. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 61 and therefore deny those allegations.
62. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 62 and therefore deny those allegations.
63. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 63 and therefore deny those allegations.
64. Defendant-Intervenors deny the allegations in paragraph 64.

65. Defendant-Intervenors deny the allegations in paragraph 65.
66. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 66 and therefore deny those allegations.
67. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 67 and therefore deny those allegations.
68. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 68 and therefore deny those allegations.
69. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 69 and therefore deny those allegations.
70. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 70 and therefore deny those allegations.
71. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 71 and therefore deny those allegations.
72. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 72 and therefore deny those

allegations.

73. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 73 and therefore deny those allegations.
74. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 74 and therefore deny those allegations.
75. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 75 and therefore deny those allegations.
76. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 76 and therefore deny those allegations.
77. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 77 and therefore deny those allegations.
78. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 78 and therefore deny those allegations.
79. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 79 and therefore deny those

allegations.

80. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 80 and therefore deny those allegations.
81. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 81 and therefore deny those allegations.
82. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 82 and therefore deny those allegations.
83. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 83 and therefore deny those allegations.
84. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 84 and therefore deny those allegations.
85. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 85 and therefore deny those allegations, except to the extent that they contain conclusions of law, to which no response is required.
86. Defendant-Intervenors lack knowledge or information sufficient to form a belief

about the truth of the allegations in paragraph 86 and therefore deny those allegations.

87. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 87 and therefore deny those allegations.

88. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 88 and therefore deny those allegations.

89. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 89 and therefore deny those allegations.

90. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 90 and therefore deny those allegations.

91. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 91 and therefore deny those allegations.

92. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 92 and therefore deny those allegations.

93. Defendant-Intervenors lack knowledge or information sufficient to form a belief

about the truth of the allegations in paragraph 93 and therefore deny those allegations.

94. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 94 and therefore deny those allegations.

95. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 95 and therefore deny those allegations.

96. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 96 and therefore deny those allegations.

97. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 97 and therefore deny those allegations.

98. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 98 and therefore deny those allegations.

99. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 99 and therefore deny those allegations.

100. Defendant-Intervenors lack knowledge or information sufficient to form a belief

about the truth of the allegations in paragraph 100 and therefore deny those allegations.

101. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 101 and therefore deny those allegations.
102. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 102 and therefore deny those allegations.
103. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 103 and therefore deny those allegations.
104. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 104 and therefore deny those allegations, except to the extent that they contain conclusions of law, to which no response is required.
105. Defendant-Intervenors deny the allegations in paragraph 105.
106. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 106 and therefore deny those allegations.
107. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 107 and therefore deny those



allegations.

108. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 108 and therefore deny those allegations.
109. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 109 and therefore deny those allegations.
110. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 110 and therefore deny those allegations.
111. Defendant-Intervenors deny the allegations in paragraph 111.
112. Defendant-Intervenors deny the allegations in paragraph 112.
113. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 113 and therefore deny those allegations.
114. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 114 and therefore deny those allegations.
115. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 115 and therefore deny those allegations.

116. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 116 and therefore deny those allegations.
117. Defendant-Intervenors deny the allegations in paragraph 117.
118. Defendant-Intervenors deny the allegations in paragraph 118.
119. Defendant-Intervenors deny the allegations in paragraph 119.
120. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 120 and therefore deny those allegations.
121. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 121 and therefore deny those allegations.
122. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 122 and therefore deny those allegations.
123. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 123 and therefore deny those allegations.
124. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 124 and therefore deny those allegations.

125. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 125 and therefore deny those allegations.
126. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 126 and therefore deny those allegations.
127. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 127 and therefore deny those allegations.
128. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 128 and therefore deny those allegations.
129. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 129 and therefore deny those allegations.
130. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 130 and therefore deny those allegations.
131. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 131 and therefore deny those allegations.

132. Defendant-Intervenors deny the allegations in paragraph 132.
133. Defendant-Intervenors admit on information and belief that particular admissions policies have a disparate negative impact on minority applicants, but Defendant-Intervenors otherwise deny the allegations in paragraph 133.
134. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 134 and therefore deny those allegations.
135. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 135 and therefore deny those allegations.
136. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 136 and therefore deny those allegations.
137. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 137 and therefore deny those allegations.
138. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 138 and therefore deny those allegations.
139. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 139 and therefore deny those

allegations.

140. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 140 and therefore deny those allegations.
141. Defendant-Intervenors deny the allegations in paragraph 141.
142. Defendant-Intervenors admit on information and belief that the University of North Carolina at Chapel Hill has an early admission program, but otherwise lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 142 and therefore deny those allegations.
143. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 143 and therefore deny those allegations.
144. Defendant-Intervenors admit on information and belief the allegations of paragraph 144.
145. Defendant-Intervenors deny the allegations in paragraph 145.
146. Defendant-Intervenors deny the allegations in paragraph 146.
147. Paragraph 147 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 147.
148. Defendant-Intervenors deny the allegations in paragraph 148, except to the extent they contain conclusions of law, to which no response is required.

149. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 149 and therefore deny those allegations.
150. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 150 and therefore deny those allegations.
151. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 151 and therefore deny those allegations.
152. Defendant-Intervenors admit upon information and belief the allegations in the first sentence of paragraph 152. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in the second sentence of paragraph 152 and therefore deny those allegations.
153. Defendant-Intervenors admit upon information and belief the allegations in paragraph 153.
154. Defendant-Intervenors deny the allegations in paragraph 154.
155. Defendant-Intervenors deny the allegations in paragraph 155.
156. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 156 and therefore deny those allegations.
157. Defendant-Intervenors deny the allegations in paragraph 157, except to the extent

they contain conclusions of law, to which no response is required.

158. Defendant-Intervenors deny the allegations in paragraph 158.
159. Defendant-Intervenors deny the allegations in paragraph 159.
160. Defendant-Intervenors deny the allegations in paragraph 160.
161. Defendant-Intervenors deny the allegations in paragraph 161.
162. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 162 and therefore deny those allegations.
163. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 163 and therefore deny those allegations.
164. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 164 and therefore deny those allegations.
165. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 165 and therefore deny those allegations.
166. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 166 and therefore deny those allegations.
167. Defendant-Intervenors lack knowledge or information sufficient to form a belief

- about the truth of the allegations in paragraph 167 and therefore deny those allegations.
168. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 168 and therefore deny those allegations.
169. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 169 and therefore deny those allegations.
170. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 170 and therefore deny those allegations.
171. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 171 and therefore deny those allegations.
172. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 172 and therefore deny those allegations.
173. Defendant-Intervenors deny the allegations in paragraph 173.
174. Paragraph 174 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 174.



175. Paragraph 175 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 175.
176. Paragraph 176 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 176.
177. Paragraph 177 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 177.
178. Paragraph 178 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 178.
179. Paragraph 179 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 179.
180. Paragraph 180 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 180.
181. Paragraph 181 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 181.

182. Paragraph 182 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 182.
183. Paragraph 183 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 183.
184. Paragraph 184 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 184.
185. Paragraph 185 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 185.
186. Paragraph 186 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 186.
187. Paragraph 187 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 187.
188. Paragraph 188 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 188.

189. Paragraph 189 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 189.
190. Paragraph 190 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 190.
191. Paragraph 191 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 191.
192. Paragraph 192 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 192.
193. Paragraph 193 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 193.
194. Paragraph 194 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 194.
195. Paragraph 195 states a conclusion of law, to which no response is required. To the extent a response is required, Defendant-Intervenors deny the allegations in paragraph 195.

196. Paragraph 196 states conclusions of law and Plaintiff's characterization of its claims, to which no response is required. To the extent necessary, Defendant-Intervenors deny the allegations in paragraph 196.
197. Defendant-Intervenors incorporate their responses to paragraphs 1 through 196 as if fully set forth herein.
198. Defendant-Intervenors deny the allegations in paragraph 198. Defendant-Intervenors further state upon information and belief that that Plaintiff's claims arising under Section 1981 have been dismissed pursuant to the filing of a Joint Stipulation of Dismissal on March 20, 2015.
199. Defendant-Intervenors deny the allegations in paragraph 199.
200. Defendant-Intervenors deny the allegations in paragraph 200.
201. Defendant-Intervenors deny the allegations in paragraph 201. Defendant-Intervenors further state upon information and belief that that Plaintiff's claims arising under Section 1981 have been dismissed pursuant to the filing of a Joint Stipulation of Dismissal on March 20, 2015.
202. Defendant-Intervenors deny the allegations in paragraph 202.
203. Defendant-Intervenors deny the allegations in paragraph 203.
204. Defendant-Intervenors incorporate their responses to paragraphs 1 through 203 as if fully set forth herein.
205. Defendant-Intervenors deny the allegations in paragraph 205. Defendant-Intervenors further state upon information and belief that that Plaintiff's claims

arising under Section 1981 have been dismissed pursuant to the filing of a Joint Stipulation of Dismissal on March 20, 2015.

206. Paragraph 206 states conclusions of law, to which no response is required. To the extent necessary, Defendant-Intervenors deny the allegations in paragraph 206.
207. Defendant-Intervenors lack knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 207 and therefore deny those allegations.
208. Defendant-Intervenors deny the allegations in paragraph 208.
209. Defendant-Intervenors deny the allegations in paragraph 209.
210. Defendant-Intervenors deny the allegations in paragraph 210.
211. Defendant-Intervenors deny the allegations in paragraph 211.
212. Defendant-Intervenors deny the allegations in paragraph 212.
213. Defendant-Intervenors deny the allegations in paragraph 213.
214. Defendant-Intervenors incorporate their responses to paragraphs 1 through 213 as if fully set forth herein.
215. Defendant-Intervenors deny the allegations in paragraph 215. Defendant-Intervenors further state upon information and belief that that Plaintiff's claims arising under Section 1981 have been dismissed pursuant to the filing of a Joint Stipulation of Dismissal on March 20, 2015.
216. Paragraph 216 states conclusions of law, to which no response is required.
217. Defendant-Intervenors deny the allegations in paragraph 217.

218. Paragraph 218 states conclusions of law and Plaintiff's characterization of its claims, to which no response is required. To the extent necessary, Defendant-Intervenors deny the allegations in paragraph 218.
219. Paragraph 219 states conclusions of law and Plaintiff's characterization of its claims, to which no response is required. To the extent necessary, Defendant-Intervenors deny the allegations in paragraph 219.
220. Paragraph 220 states conclusions of law and Plaintiff's characterization of its claims, to which no response is required. To the extent necessary, Defendant-Intervenors deny the allegations in paragraph 220.
221. Paragraph 221 states conclusions of law and Plaintiff's characterization of its claims, to which no response is required. To the extent necessary, Defendant-Intervenors deny the allegations in paragraph 221.
222. Defendant-Intervenors deny the allegations in paragraph 222.
223. Paragraph 223 states conclusions of law and Plaintiff's characterization of its claims, to which no response is required. To the extent necessary, Defendant-Intervenors deny the allegations in paragraph 223.
224. Defendant-Intervenors deny the allegations in paragraph 224.
225. Defendant-Intervenors deny the allegations in paragraph 225. Defendant-Intervenors further state upon information and belief that that Plaintiff's claims arising under Section 1981 have been dismissed pursuant to the filing of a Joint Stipulation of Dismissal on March 20, 2015.

226. Defendant-Intervenors deny the allegations in paragraph 226.

227. Defendant-Intervenors deny the allegations in paragraph 227.

ANSWER TO WHEREFORE: The requests for relief contained in the Wherefore clauses following paragraph 227 contain legal conclusions, to which no response is required by the Defendant-Intervenors. To the extent any response is required, Defendants deny the request for relief in the Wherefore clauses. Defendant-Intervenors further state upon information and belief that that Plaintiff's claims arising under Section 1981 have been dismissed pursuant to the filing of a Joint Stipulation of Dismissal on March 20, 2015.

**WHEREFORE**, Defendant-Intervenors respectfully request that the Court enter judgment in its favor and award it the costs of this action, together with attorneys' fees, expert fees, and such other relief as the Court may deem just and proper.

Dated: June 29, 2015

Respectfully submitted,

/s/ Reed Colfax

Reed Colfax\*

Glenn Schlactus\*

Sasha Samberg-Champion\*

Laura Gaztambide-Arandes\*

RELMAN, DANE & COLFAX PLLC

1225 19th Street NW, Suite 600

Washington, DC 20036

[rcolfax@relmanlaw.com](mailto:rcolfax@relmanlaw.com)

[gschlactus@relmanlaw.com](mailto:gschlactus@relmanlaw.com)

[ssamberg-champion@relmanlaw.com](mailto:ssamberg-champion@relmanlaw.com)

[larandes@relmanlaw.com](mailto:larandes@relmanlaw.com)

Tel: (202) 728-1888

/s/ Jack Holtzman

Jack Holtzman, N.C. Bar No. 13548  
Christine Bischoff, N.C. Bar No. 41792  
NORTH CAROLINA JUSTICE CENTER  
224 South Dawson Street  
Raleigh, NC 27601  
[jack@ncjustice.org](mailto:jack@ncjustice.org)  
[christine@ncjustice.org](mailto:christine@ncjustice.org)  
Tel: (919) 856-2165

/s/ Jon M. Greenbaum

Jon M. Greenbaum\*  
LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW  
1401 New York Avenue NW, Suite 400  
Washington, DC 20005  
[jgreenbaum@lawyerscommittee.org](mailto:jgreenbaum@lawyerscommittee.org)  
Tel: (202) 662-8600

ATTORNEYS FOR PROPOSED  
DEFENDANT-INTERVENORS

\* *Special Appearance*



**CERTIFICATE OF SERVICE**

In accordance with Local Rule 5.3(b)(2), I hereby certify that this document filed through the CM-ECF system on June 29, 2015 will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Reed Colfax  
Reed Colfax