

UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

Democratic National Committee v. Republican National Committee

Democratic National Committee · No. No. 18-1215 · Decided January 7, 2019

SUMMARY

The Third Circuit affirmed the District Court’s orders denying the Democratic National Committee’s discovery requests and declaring expired a consent decree restricting certain Republican National Committee ballot-security activities. The Court held that the District Court acted within its discretion in managing discovery and determining that the DNC had not shown a violation of the decree.

CASE DETAILS

COURT	United States Court of Appeals for the Third Circuit
WRITING FOR THE COURT	Fisher, Circuit Judge; Shwartz, Circuit Judge; Roth, Circuit Judge
JURISDICTION	Federal
DECIDED	January 7, 2019
DOCKET	No. 18-1215
DISPOSITION	affirmed
PROCEDURAL POSTURE	The Democratic National Committee appealed orders of the United States District Court for the District of New Jersey denying or limiting discovery and declaring an enforcement consent decree expired.
STANDARD OF REVIEW	Discovery orders and decisions whether to modify or vacate a consent decree are reviewed for abuse of discretion. Discovery rulings are not disturbed absent actual and substantial prejudice; an abuse of discretion requires a decision that is arbitrary, fanciful, or clearly unreasonable.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Democratic National Committee, New Jersey Democratic State Committee, Virginia L. Feggins, Lynette Monroe v. Republican National Committee, New Jersey Republican State Committee, Alex Hurtado, Ronald C. Kaufman, John Kelly

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QUESTIONS PRESENTED

1. Whether the District Court abused its discretion in limiting or denying the DNC's discovery requests.
2. Whether the District Court abused its discretion in declaring the consent decree expired after the DNC failed to prove a violation.
3. Whether the District Court had jurisdiction to enforce the consent decree and whether the Third Circuit had appellate jurisdiction.

HOLDINGS

1. The District Court did not abuse its discretion in limiting or denying the DNC's discovery requests.
2. The District Court did not abuse its discretion in declaring the consent decree expired according to its terms.
3. The District Court retained federal-question jurisdiction to enforce the consent decree, and the Third Circuit had appellate jurisdiction under the decree's express reservation of appellate jurisdiction and 28 U.S.C. § 1291.

KEY QUOTATIONS

“The court may limit discovery to ensure its scope is proportional to the needs of a case, and the court considers, among other factors, “whether the burden or expense of the proposed discovery outweighs its likely benefit.”” (at 5)

“The District Court did not abuse its discretion, and we will not upset its thoughtful adjudication of the matter.” (at 9)

FACTUAL BACKGROUND

The DNC and RNC were parties to a consent decree prohibiting the RNC and New Jersey Republican State Committee from conducting ballot-security programs aimed at preventing potential voters from registering or casting ballots, while permitting normal poll-watching functions. Before the 2016 presidential election, the DNC alleged that the RNC coordinated with the Trump campaign to suppress or intimidate minority voters and sought contempt relief and a preliminary injunction. The District Court permitted extensive discovery but concluded that the evidence did not establish a violation of the decree and that the decree had expired under its terms.

PROCEDURAL HISTORY

The DNC and RNC entered a 1982 consent decree resolving a 1981 lawsuit alleging intimidation of minority voters. Shortly before the 2016 presidential election, the DNC moved to hold the RNC in contempt and sought a preliminary injunction based on alleged coordination with the Trump campaign concerning ballot-security activities. After approximately fifteen months of discovery, the District Court denied the preliminary injunction,

rejected the DNC's discovery challenges, found that the DNC had not proved a decree violation by a preponderance of the evidence, and declared the decree expired. The Third Circuit affirmed.

DISPOSITION

affirmed

CASES CITED

- Democratic National Committee v. Republican National Committee, 673 F.3d 192, 201, 203 (3d Cir. 2012), cert. denied, 568 U.S. 1138 (2013)
- Frew v. Hawkins, 540 U.S. 431, 440 (2004)
- Keefe v. Prudential Property & Casualty Co., 203 F.3d 218, 223 (3d Cir. 2000)
- Halderman v. Pennhurst State School & Hospital, Halderman v. Pennhurst State School & Hospital, 901 F.2d 311, 317 (3d Cir. 1990)
- Anderson v. Wachovia Mortgage Corp., 621 F.3d 261, 281 (3d Cir. 2010)
- Delaware Valley Citizens' Council for Clean Air v. Pennsylvania, 755 F.2d 38, 41 (3d Cir. 1985)
- California Department of Social Services v. Leavitt, 523 F.3d 1025, 1031-34 (9th Cir. 2008)
- Moyer v. United Dominion Industries, Inc., 473 F.3d 532, 542 (3d Cir. 2007)