January 17, 1977

Memorandum for HPW

Re: Marianas

Perhaps you should add to the firm's Supreme Court list <u>Town of Lockport v. Citizens for Community</u> <u>Action</u>. It involves the question whether the 14th Amendment permits amendment of county charters by a majority of <u>both</u> those voting in areas outside of cities in the county <u>and</u> those voting in the cities located in the county. The District Court was of the view that the 14th Amendment requires a simple majority of <u>all</u> votes cast. 45 U.S.L.W. 3444, 3701, 3412.

Argued 11/30/76.