

STEVE ELZINGA
Oregon Bar No. 123102
SHERMAN, SHERMAN, JOHNNIE & HOYT, LLP
693 Chemeketa St. NE
Salem, OR 97301
Telephone: 503-364-2281
steve@shermlaw.com

Attorneys for Plaintiffs
PEOPLE NOT POLITICIANS OREGON,
COMMON CAUSE, LEAGUE OF WOMEN
VOTERS OF OREGON, NAACP OF
EUGENE/SPRINGFIELD, INDEPENDENT
PARTY OF OREGON, and C. NORMAN
TURRILL

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

PEOPLE NOT POLITICIANS OREGON,
COMMON CAUSE, LEAGUE OF WOMEN
VOTERS OF OREGON, NAACP OF
EUGENE/SPRINGFIELD, INDEPENDENT
PARTY OF OREGON, and C. NORMAN
TURRILL,

Plaintiffs,

v.

BEVERLY CLARNO, OREGON
SECRETARY OF STATE,

Defendants.

Case No. 6:20-cv-01053-MC

**PLAINTIFFS' MOTION FOR LEAVE
TO FILE REPLY IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION
(UNOPPOSED)**

LOCAL RULE 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, counsel for Plaintiffs certifies that they have conferred in good faith with counsel for Defendant and Proposed Intervenor regarding filing a reply. Both Defendant and Proposed Intervenors indicated they did not object to Plaintiffs filing a reply.

PLAINTIFFS' MOTION FOR LEAVE TO FILE REPLY

The Plaintiffs in the above-captioned case, through counsel, respectfully move for leave to submit the attached Reply in Support of Plaintiffs' Motion for Preliminary Injunction. This Reply responds to arguments made by Defendant and Proposed Intervenors in their response briefings filed at 1:04 PM and 1:10 PM July 9.

In light of new arguments raised by Defendant and Proposed Intervenors since Plaintiffs' filed their motion, as well as the highly-relevant Ninth Circuit order released July 9 allowing injunctive relief from initiative requirements in Idaho similar to what Plaintiffs request, Plaintiffs believe the Court and all parties would benefit from this Reply.

A Reply is allowed under Local Rule 7-1(e)(2) and this Court's instructions at 3:58 PM July 9 that the Court "would like a reply as soon as possible."

DATED: July 10, 2020

SHERMAN, SHERMAN, JOHNNIE &
HOYT, LLP

By: s/ Steve Elzinga

STEVE ELZINGA
Attorneys for Plaintiffs

PEOPLE NOT POLITICIANS OREGON,
COMMON CAUSE, LEAGUE OF
WOMEN VOTERS OF OREGON, NAACP
OF EUGENE/SPRINGFIELD,
INDEPENDENT PARTY OF OREGON,
and C. NORMAN TURRILL