

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION**

BONNIE HEATHER MILLER, ROBERT
WILLIAM ALLEN, ADELLA DOZIER
GRAY, and ARKANSAS VOTERS FIRST,

Plaintiffs,

v.

JOHN THURSTON, in his official capacity
as Secretary of State of Arkansas,

Defendant.

Case No. 5:20-cv-05070-PKH

Hon. Paul K. Holmes, III

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Bonnie Heather Miller, Robert William Allen, Adella Dozier Gray, and Arkansas Voters First (“Plaintiffs”) respectfully move this Court for a preliminary injunction as set out in the accompanying Brief in Support of Plaintiffs’ Motion for Preliminary Injunction. Fed. R. Civ. P. 65(a); Local Rule 7.2(e). Plaintiffs seek tailored relief from Arkansas’s requirements to place a constitutional amendment on the ballot, which have become impossible to satisfy in combination with restrictions imposed to address the COVID-19 pandemic, severely burdening Plaintiffs rights under the First and Fourteenth Amendments of the U.S. Constitution.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion and issue a preliminary injunction pending a decision on the merits of Plaintiffs’ claims in this matter.

Dated: April 22, 2020

Respectfully submitted,

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* Motions for *pro hac vice* pending

CERTIFICATE OF SERVICE

I certify that on April 22, 2020, I caused a copy of Plaintiffs' Complaint, along with the foregoing Motion and the accompanying Brief and Exhibits, to be served upon counsel for Defendant by e-mail at the address below. I also contacted counsel for Defendant by phone, who indicated he would accept service on behalf of Defendant.

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