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**UNITED STATES DISTRICT COURT  
DISTRICT OF IDAHO**

AHNIAH SELENE; KASSIE HOWE;  
DISABILITY ACTION CENTER –  
NORTHWEST, INC.; DISABILITY RIGHTS  
IDAHO; LIVING INDEPENDENCE  
NETWORK CORPORATION IDAHO; LIFE, A  
CENTER FOR INDEPENDENT LIVING; AND  
INTERMOUNTAIN FAIR HOUSING  
COUNCIL,

PLAINTIFFS,

v.

LEGISLATURE OF THE STATE OF  
IDAHO,

Case No. 1:21-cv-00021-DCN

**MOTION FOR A TEMPORARY  
RESTRAINING ORDER OR, IN THE  
ALTERNATIVE, A PRELIMINARY  
INJUNCTION**

MOTION FOR A TEMPORARY RESTRAINING ORDER OR, IN THE ALTERNATIVE, A  
PRELIMINARY INJUNCTION - 1

SCOTT BEDKE, in his official capacity  
as Speaker of the House of  
Representatives of the State of Idaho,

CHUCK WINDER, in his official capacity  
as President Pro Tempore of the Idaho  
State Senate,

Defendants.

For the reasons stated in the accompanying memorandum, Plaintiffs respectfully move for a temporary restraining order or, in the alternative, a preliminary injunction against Defendants Idaho State Legislature, Speaker of the Idaho House of Representatives Scott Bedke, and President Pro Tempore of the Idaho Senate Chuck Winder, restraining them from implementing and enforcing a policy that denies Plaintiffs the right to participate fully and safely in the 2021 Idaho legislative session and ordering Defendants to grant a reasonable modification that ensures Plaintiffs can safely and fully participate in the Idaho legislative process.

Plaintiffs submit the following declarations in support of this Motion:

- (1) Declaration of Ahniah Selene;
- (2) Declaration of Kassie Howe;
- (3) Declaration of Mark Leeper, Executive Director, Disability Action Center – Northwest, Inc.;
- (4) Declaration of Amy Cunningham, Executive Director, DisAbility Rights Idaho;
- (5) Declaration of Jeremy Maxand, Executive Director, Living Independence Network Corporation Idaho;
- (6) Declaration of Heather Clarke, Deputy Director, Life, A Center for Independent Living; and

(7) Declaration of Zoe Ann Olson, Executive Director, Intermountain Fair Housing Council.

Plaintiffs request that the Court hold a hearing on Plaintiffs' Motion where oral argument may be presented. In light of the constitutional interests asserted, Plaintiffs believe that oral argument is warranted and will aid the Court's disposition of Plaintiffs' Motion.

Respectfully submitted,

DATED: January 11, 2021.

STOEL RIVES LLP

/s/ Wendy J. Olson

Wendy J. Olson

Elijah M. Watkins

Attorneys for Plaintiffs