

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., DEMOCRACY
NASHVILLE-DEMOCRATIC
COMMUNITIES, THE EQUITY ALLIANCE,
and THE ANDREW GOODMAN
FOUNDATION,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee,
MARK GOINS, in his official capacity as
Coordinator of Elections for the State of
Tennessee, HERBERT SLATERY III, in his
official capacity as Attorney General of the
State of Tennessee, the STATE ELECTION
COMMISSION, and DONNA BARRETT,
JUDY BLACKBURN, GREG DUCKETT,
MIKE MCDONALD, JIMMY WALLACE,
TOM WHEELER, and KENT YOUNCE, in
their official capacities as members of the State
Election Commission,

Defendants.

Case No. 3:19-cv-00365
Judge Aleta A. Trauger

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs request that the Court preliminarily enjoin the implementation of Tennessee's new law, Public Chapter 250 (the "Law"), to be codified as Sections 2-2-142, 2-2-143, 2-19-145 of the Tennessee Code, which is scheduled to take effect on October 1, 2019. In support of this Motion, Plaintiffs will rely on the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Injunction and the Declarations of Gloria Jean Sweet-Love of the Tennessee State Conference of the N.A.A.C.P.

(Exhibit 1), Sekou Franklin of Democracy Nashville-Democratic Communities (Exhibit 2), Charlane Oliver of The Equity Alliance (Exhibit 3), and David Goodman of The Andrew Goodman Foundation (Exhibit 4). Plaintiffs respectfully request that the Court schedule a hearing on this Motion.

August 16, 2019

Respectfully submitted,

/s/ Taylor A. Cates

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**pro hac forthcoming*

*Counsel for the Tennessee State Conference
of the N.A.A.C.P., Democracy Nashville—
Democratic Communities, The Equity
Alliance, and The Andrew Goodman
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document has been served via the Court's CM/ECF electronic case filing system to:

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on this 16th day of August, 2019.

/s/ Taylor A. Cates
TAYLOR A. CATES