

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

NEW VIRGINIA MAJORITY EDUCATION
FUND; VIRGINIA CIVIC ENGAGEMENT
TABLE; MICHAEL KERN; and KATHY KERN,

Plaintiffs,

v.

VIRGINIA DEPARTMENT OF ELECTIONS;
VIRGINIA STATE BOARD OF ELECTIONS;
EDGARDO CORTES, in his official capacity as
Commissioner of the Virginia Department of
Elections; JAMES B. ALCORN, in his official
capacity as Chairman of the State Board of
Elections; CLARA BELLE WHEELER, in her
official capacity as Vice Chair of the Board; and
SINGLETON V. MCALLISTER, in her official
capacity as Secretary of the Board,

Defendants.

Civil Action No. _____

**PLAINTIFFS' EMERGENCY
MOTION FOR A PRELIMINARY
INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs New Virginia Majority Education Fund ("NVMEF"), Virginia Civic Engagement Table ("VCET"), Michael Kern, and Kathy Kern hereby move for a preliminary injunction requiring Defendants, the Virginia Department of Elections and its Commissioner, and the State Board of Elections and its Chairman, Vice Chair, and Secretary, to take all action necessary to reopen and extend the October 17, 2016 voter registration deadline in Virginia for at least an additional 72 hours, and to take all action necessary to provide notice to the public of the reopening and extension. A memorandum in support of this motion and a proposed order are being filed contemporaneously herewith.

Dated: October 18, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on October 18, 2016, I caused the foregoing to be electronically filed using the Court's CM/ECF system, which will automatically send a notice of electronic filing to all counsel of record.

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