Chris McClure McClure and Hardy Prof. LLC SD Bar No. 3962 101 S. Reid St. Ste. 307 Sioux Falls, SD 57103 605-496-9858 mcclurechris@gmail.com

Michael J. Novotny Big Fire Law & Policy Group LLP 1404 Fort Crook Road South Bellevue, NE 68005 AZ State Bar No. 033792

Telephone: (531) 466-8725 Facsimile: (531) 466-8792

Email: mnovotny@bigfirelaw.com

Attorney for Plaintiffs

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Darlene Yazzie, Caroline Begay, Leslie Begay, Irene Roy, Donna Williams and Alfred McRoye,

Case No. 3:20-cv-08222-GMS

Plaintiffs,

v.

Katie Hobbs, in her official capacity as Secretary of State for the State of Arizona,

Defendant.

PLAINTIFFS' MOTION FOR EMERGENCY HEARING ON MOTION FOR PRELIMINARY INJUNCTION AND PERMANENT INJUNCTION

For the reasons outlined in Plaintiffs' Motion for Preliminary and Permanent Injunction and Memorandum in Support thereof filed on September 2, 2020, Plaintiffs hereby request this Court to:

1. Set a hearing on Plaintiffs' request for preliminary injunction for September 21, 2020 at 9:00 A.M., or as soon thereafter as possible;

- 2. Enter a preliminary injunction against Defendant and mandating that Defendant count all vote by mail ballots for the November 3, 2020 election, which are cast by Plaintiffs and all Members of the Navajo Nation who reside on the Navajo Nation Reservation as long as the ballot is postmarked on or before November 3, 2020;
- 3. Enter a preliminary injunction against Defendant and directing any further relief which the Court deems to be necessary and proper in order to ensure that the voting rights of Plaintiffs and all Members of the Navajo Nation who reside On-Reservation, are properly respected in accordance with the Orders of this Court; and
  - Grant such other and further relief as this Court deems appropriate.
     Dated this 7<sup>th</sup> day of September 2020.

/s/ Chris McClure

Chris McClure
McClure and Hardy Prof. LLC
SD Bar No. 3962
101 S. Reid St. Ste. 307
Sioux Falls, SD 57103
605-496-9858
mcclurechris@gmail.com

## /s/ Michael J. Novotny

Michael J. Novotny
Big Fire Law & Policy Group LLP
1404 Fort Crook Road South
Bellevue, NE 68005
AZ State Bar No. 033792
Telephone: (531) 466-8725

Facsimile: (531) 466-8792

Email: mnovotny@bigfirelaw.com

ATTORNEYS FOR PLAINTIFFS

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 7, 2020, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing.

/s/Chris McClure
/s/ Michael J. Novotny
75/ Wilchael 3. INOVOLITY
Attorney for the Plaintiffs