

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

JILL STEIN and RANDALL REITZ,

Plaintiffs,

-against-

PEDRO A. CORTÉS, in his official capacity as
Secretary of the Commonwealth; and JONATHAN
MARKS, in his official capacity as Commissioner
of the Bureau of Commissions, Elections, and
Legislation,

Defendants.

No. 16-CIV-6287-PD

PROPOSED ORDER

AND NOW, this _____ day of 2016, for the reasons set forth _____, it is
hereby ORDERED that:

1. The motion of Plaintiffs for a preliminary injunction is GRANTED;
2. Pedro A. Cortes, the Secretary of the Commonwealth of Pennsylvania, and Jonathan Marks, the Commissioner of the Bureau of Commissions, Elections, and Legislation, are preliminarily ENJOINED to direct forthwith all of the County Boards of Elections throughout Pennsylvania to (a) institute an immediate recount of paper ballots in optical scan counties in Pennsylvania; and (b) permitting plaintiffs immediate access to a reasonable sample of the central computers for DRE voting systems in Pennsylvania to do a thorough, forensic examination.
3. Pedro A. Cortes and Jonathan Marks are further preliminary ENJOINED to take all reasonable steps to ensure that all County Boards of Elections throughout Pennsylvania comply with the above directive.

BY THE COURT,

Dated: December __, 2016

Paul S. Diamond, J.

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Plaintiffs,

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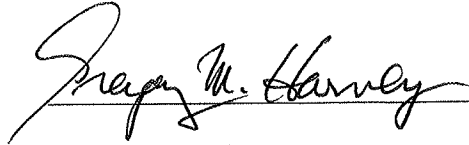
Defendants.

No. 16-CIV-6287-PD

**MOTION FOR AN EXPEDITED/
EMERGENCY HEARING FOR A
PRELIMINARY INJUNCTION**

NOW COME THE PLAINTIFFS, based upon their Complaint, Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction, Declaration of Ilann Maazel, dated December 6, 2016, and all exhibits and declarations attached thereto, move this Court, for an emergency hearing on a preliminary injunction, pursuant to Federal Rule of Civil Procedure 65, preliminarily enjoining Defendants, their agents, officers, and employees, and all persons acting in concert or cooperation with them to: (a) institute an immediate recount of paper ballots in optical scan counties in Pennsylvania; and (b) permitting plaintiffs immediate access to a reasonable sample of the central computers for DRE voting systems in Pennsylvania to do a thorough, forensic examination.

Dated: December 6, 2016



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** Not admitted in E.D. Pa.; motion for
pro hac vice admission forthcoming*