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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF IDAHO**

NICHOLAS JONES FOR CONGRESS,

Plaintiff,

v.

IDAHO SECRETARY OF STATE,
LAWRENCE DENNEY,

Defendants.

Case No.

MOTION FOR TEMPORARY
RESTRAINING ORDER AND
EMERGENCY INJUNCTIVE RELIEF

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff, Nicolas Jones for Congress, by and through its attorney of record, hereby moves this court for entry of an Order Granting Motion for Temporary Restraining Order and Emergency Injunctive Relief, ordering Defendant, either directly or indirectly, to engaging in the following acts:

1. To take such steps as are necessary to ensure that Idaho voters have access to request and receive absentee ballots until 8:00pm on Tuesday, May 26, 2020; and
2. To provide public notice of these extended voting opportunities by notifying all local media of the extension and by posting notices of the extension at all affected poll locations.

This motion is made on the grounds and reasons set forth in the accompanying Declaration of Matt Braynard and Memorandum in Support of Motion for Temporary Restraining Order and Emergency Injunctive Relief. Oral argument is requested.

DATED THIS 19 day of May, 2020.

PARSONS BEHLE & LATIMER

By: /s/ Amy A. Lombardo
Amy A. Lombardo
Attorney for Plaintiff,
Nicholas Jones for Congress

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of May, 2020, a true and correct copy of the within and foregoing instrument was served upon:

Idaho Secretary of State
Elections and Administration
700 W. Jefferson Street, Room E205
Boise, ID 83702

- ☐ U.S. Mail
- ☐ Facsimile
- ☐ Hand Delivery
- ☐ Overnight Delivery
- ☒ Email elections@sos.idaho.gov

Lawrence Denney, Secretary of State
Idaho Secretary of State
Elections and Administration
700 W. Jefferson Street, Room E205
Boise, ID 83702

- ☐ U.S. Mail
- ☐ Facsimile
- ☐ Hand Delivery
- ☐ Overnight Delivery
- ☒ Email elections@sos.idaho.gov

/s/ Amy A. Lombardo

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