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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

PAM POE, et al.,

Plaintiffs,

v.

RAÚL LABRADOR, et al.,

Defendants.

Case No. 1:23-cv-00269-CWD

**MOTION FOR A
PRELIMINARY INJUNCTION**

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The Plaintiffs move this Court, under Federal Rule of Civil Procedure 65, for a preliminary injunction prohibiting the Defendants, as well as their officers, agents, employees, attorneys, and any person who is in active concert or participation with them, from enforcing any of the provisions of House Bill 71, as passed by the Sixty-seventh Idaho Legislature in its Regular Session and enacted on March 30, 2023. The bill is to be codified at Idaho Code §§ 18-1506C and 19-5307 and will also be published at 2023 Idaho Session Laws ch. 292. A copy of the bill is attached to the Complaint for Declaratory and Injunctive Relief (Dkt. 1) and to the memorandum of law supporting this motion. The Plaintiffs also move this Court for an order waiving the requirement for bond or security from them.

This motion is based on the memorandum of law in its support and the declarations filed with it, as well as the Complaint (Dkt. 1). Plaintiffs make this motion on the grounds that the provisions of House Bill 71 are unconstitutional, as set out in the accompanying memorandum of law.

Date: July 21, 2023

Respectfully submitted,

/s/ Alexia D. Korberg

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