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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

LINDSAY HECOX, et al.,

Plaintiffs,

v.

BRADLEY LITTLE, et al.,

Defendants.

No. 1:20-cv-184-CWD

MOTION FOR A PRELIMINARY INJUNCTION (EQUAL PROTECTION CLAIM) 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 500, as passed by the Sixty-fifth Idaho Legislature in its Second Regular Session and enacted on March 30, 2020. The bill is to be codified as Idaho Code §§ 33-6201 through 33-6206 and is also found at 2020 Idaho Session Laws ch. 333. A copy of the bill is attached as Exhibit A to the Complaint in this case (Dkt. 1 at 57). The plaintiffs also move this Court for an order waiving the requirement for bond or security from the plaintiffs.

This motion is based on the brief in its support and the declarations filed with it, as well as the Complaint (Dkt. 1). The plaintiffs make this motion on the grounds that the bill violates the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution, as set out in their brief.

Dated: April 30, 2020.

/s/ Richard Eppink

Richard Eppink American Civil Liberties Union of Idaho Foundation

Gabriel Arkles James Esseks Chase Strangio American Civil Liberties UNION FOUNDATION Kathleen Hartnett Elizabeth Prelogar Andrew Barr COOLEY LLP

Catherine West LEGAL VOICE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 30th day of April, 2020, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Dan Skinner <u>danskinner@cssklaw.com</u> <u>cssklaw@cssklaw.com</u> Attorney for Boise School District, Individual members of the Board of Trustees of Boise School District, Coby Dennis

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DATED this 30th day of April, 2020.

/s/ Richard Eppink