

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

A. PHILIP RANDOLPH INSTITUTE OF OHIO, et al.,

Plaintiffs,

v.

FRANK LAROSE, in his official capacity as Secretary
of State of Ohio,

Defendant.

Case No. 1: 20-cv-01908

Hon. Dan Aaron Polster

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs move for a preliminary injunction to enjoin Defendant Ohio Secretary of State Frank LaRose from enforcing Directive 2020-16's prohibition on ballot drop boxes at locations other than county boards of elections. As set forth more fully in the accompanying Memorandum, a preliminary injunction is appropriate because Directive 2020-16 is unconstitutional.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiff's motion for a preliminary injunction.

Dated: September 4, 2020

Respectfully submitted,

/s/ James Schuster

James Schuster (Ohio Bar No. 0065739)

JSA LLP

2355 Bellfield Ave.

Cleveland Heights, OH 44106

Telephone: (216) 882-9999

jschuster@OHcounsel.com

Jon Greenbaum
Ezra Rosenberg
Pooja Chaudhuri
LAWYERS' COMMITTEE FOR
CIVIL RIGHTS UNDER LAW
1500 K Street N.W., Suite 900
Washington, D.C. 20005
Telephone: (202) 662-8600
jgreenbaum@lawyerscommittee.org
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org

Subodh Chandra (Ohio Bar No. 0069233)
Donald P. Screen (Ohio Bar No. 0044070)
Brian D. Bardwell (Ohio Bar No. 0098423)
THE CHANDRA LAW FIRM LLC
1265 W. 6th St., Suite 400
Cleveland, OH 44113-1326
Telephone: (216) 578-1700
Subodh.Chandra@ChandraLaw.com
Donald.Screen@ChandraLaw.com
Brian.Bardwell@ChandraLaw.com

Neil A. Steiner (pro hac vice forthcoming)
DECHERT LLP
Three Bryant Park
1095 Avenue of the Americas
New York, New York 10019
Telephone: (212) 689-3500
neil.steiner@dechert.com

Erik Snapp
DECHERT LLP
35 West Wacker Drive, Suite 3400
Chicago, IL 60601
Telephone: (312) 646-5800
erik.snapp@dechert.com

Lindsey B. Cohan
DECHERT LLP
515 Congress Avenue, Suite 1400
Austin, Texas 78701
Telephone: (512) 394-3000
lindsey.cohan@dechert.com

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 4, 2020, a true and correct copy of the foregoing was furnished by electronic filing with the Clerk of the Court via CM/ECF, which will send notice of electronic filing to all counsel of record.

/s/ James Schuster