

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

DEMOCRACY NORTH CAROLINA, THE LEAGUE
OF WOMEN VOTERS OF NORTH CAROLINA,
DONNA PERMAR, JOHN P. CLARK,
MARGARET B. CATES, LELIA BENTLEY,
REGINA WHITNEY EDWARDS, ROBERT K.
PRIDDY II, WALTER HUTCHINS, AND
SUSAN SCHAFFER,

Plaintiffs,

vs.

THE NORTH CAROLINA STATE BOARD OF
ELECTIONS; DAMON CIRCOSTA, in his
official capacity as CHAIR OF THE
STATE BOARD OF ELECTIONS; STELLA
ANDERSON, in her official capacity
as SECRETARY OF THE STATE BOARD OF
ELECTIONS; KEN RAYMOND, in his
official capacity as MEMBER OF THE
STATE BOARD OF ELECTIONS; JEFF
CARMON III, in his official capacity
as MEMBER OF THE STATE BOARD OF
ELECTIONS; DAVID C. BLACK, in his
official capacity as MEMBER OF THE
STATE BOARD OF ELECTIONS; KAREN
BRINSON BELL, in her official
capacity as EXECUTIVE DIRECTOR OF
THE STATE BOARD OF ELECTIONS; THE
NORTH CAROLINA DEPARTMENT OF
TRANSPORTATION; J. ERIC BOYETTE, in
his official capacity as
TRANSPORTATION SECRETARY; THE NORTH
CAROLINA DEPARTMENT OF HEALTH AND
HUMAN SERVICES; MANDY COHEN, in her
official capacity as SECRETARY OF
HEALTH AND HUMAN SERVICES,

Defendants,

Civil Action
No. 20-cv-457

**PLAINTIFFS' MOTION TO
ENFORCE ORDER GRANTING
IN PART PRELIMINARY
INJUNCTION, OR, IN THE
ALTERNATIVE, MOTION FOR
CLARIFICATION, AND TO
EXPEDITE CONSIDERATION
OF SAME**

PHILIP E. BERGER, in his official capacity as PRESIDENT PRO TEMPORE OF THE NORTH CAROLINA SENATE; TIMOTHY K. MOORE, in his official capacity as SPEAKER OF THE NORTH CAROLINA HOUSE OF REPRESENTATIVES,

Defendant-Intervenors.

Plaintiffs Democracy North Carolina, The League of Women Voters of North Carolina, Donna Permar, John P. Clark, Margaret B. Cates, Lelia Bentley, Regina Whitney Edwards, Robert K. Priddy II, Walter Hutchins, and Susan Schaffer ("Plaintiffs") hereby move the Court for an Order enforcing the preliminary injunction granted on August 4, 2020 (the "PI Order"). Plaintiffs rely on the Memorandum in Support of their Motion, filed contemporaneously herewith.

WHEREFORE, Plaintiffs respectfully request that the Court issue an order enforcing its PI Order to prohibit Defendants, including the North Carolina State Board of Elections, from the disallowance or rejection, or permitting the disallowance or rejection, of absentee ballots or, in the alternative, issue a an order to clarify its August 4, 2020 PI Order to specify the procedure by which voters are to be

afforded due process in compliance with that Order, as set forth in the Memorandum of Law supporting this motion.

Dated: September 30, 2020.

Respectfully submitted,

/s/ Jon Sherman

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/s/ Allison J. Riggs

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