

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

ONE WISCONSIN INSTITUTE, INC., *et al.*,

Plaintiffs,

v.

Case No. 15-CV-324-JDP

ANN S. JACOBS, Chair, Wisconsin
Elections Commission, *et al.*,

Defendants.

JUSTIN LUFT, *et al.*,

Plaintiffs,

v.

Case No. 20-cv-768-JDP

TONY EVERS, *et al.*,

Defendants.

One Wisconsin Plaintiffs' Motion for Preliminary Injunctive Relief

The *One Wisconsin* plaintiffs, by their undersigned counsel, and pursuant to Fed. R. Civ. P. 65(a), respectfully move this Court for a preliminary injunction:

(1) finding that the Wisconsin “ID Petition Process” (IDPP) continues to violate the First and Fourteenth Amendments to the United States Constitution for all of the reasons spelled out in this Court’s several decisions about the IDPP in 2016;

(2) ordering the defendants to undertake the emergency measures set forth in Part IV-A of the *One Wisconsin* plaintiffs' accompanying brief; and

(3) ordering the Division of Motor Vehicles of the Wisconsin Department of Transportation to undertake the fundamental reforms of the IDPP called for by this Court four years ago, supplemented by the additional proposals of *One Wisconsin* and *Luft* plaintiffs in the briefs they are filing today.

Further support for this motion is set forth in the *One Wisconsin* Plaintiffs' Brief in Support of Motion for Preliminary Injunctive Relief, together with the declarations and exhibits that accompany this motion. *One Wisconsin* plaintiffs also adopt the arguments included in the *Luft* plaintiffs' brief filed today.

Dated this 18th day of September, 2020.

Respectfully submitted,

PERKINS COIE LLP

By s/ Bruce V. Spiva

Marc E. Elias
MElias@perkinscoie.com
Bruce V. Spiva
BSpiva@perkinscoie.com
Elisabeth C. Frost
EFrost@perkinscoie.com
Amanda R. Callais
ACallais@perkinscoie.com
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960
Telephone: (202) 654-6200
Facsimile: (202) 654-6211

Charles G. Curtis, Jr.
CCurtis@perkinscoie.com
33 East Main Street, Suite 201
Madison, WI 53703
Telephone: (608) 663-5411
Facsimile: (608) 663-7499

Bobbie J. Wilson
BWilson@perkinscoie.com
505 Howard Street, Suite 1000
San Francisco, CA 94111-4131
Telephone: (415) 344-7000
Facsimile: (415) 344-7050

Attorneys for Plaintiffs