

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**LEAGUE OF WOMEN VOTERS OF  
NEW HAMPSHIRE, *et al.*,**

Plaintiffs,

**STEVE KRAMER, *et al.*,**

Defendants.

Civil Action No. 1:24-cv-73-SM-TSM

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs League of Women Voters of New Hampshire (“LWV-NH”), League of Women Voters of the United States (“LWV-US”), Nancy Marashio, James Fieseher, and Patricia Gingrich (collectively, “Plaintiffs”), hereby move for a preliminary injunction enjoining Defendants Steve Kramer, Lingo Telecom, LLC, and Life Corporation (collectively, “Defendants”) from producing, generating, or distributing AI-generated robocalls impersonating any person, without that person’s express, prior written consent; from distributing spoofed telephone calls, texts messages, or any other form of spoofed communication; and from distributing telephone calls, text messages, or other mass communications that do not comply with all applicable state and federal laws or that are made for an unlawful purpose.

In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law, as well as individual declarations and corresponding exhibits of Joseph T. DiPiero, Paul Carpenter, Kathleen Sullivan, Celina Stewart, Elizabeth Tentarelli, Nancy Marashio, Patricia Gingrich, and James Fieseher.

A proposed order is attached.

Dated: April 26, 2024

Respectfully submitted,

/s/ Mark R. Herring

Mark R. Herring (DC Bar #90013124)  
Matthew R. Nicely (DC Bar #430564)  
Caroline L. Wolverton (DC Bar #496433)  
Amanda S. McGinn (DC Bar #1049085)  
Joseph T. DiPiero (DC Bar #1618536)  
Maria Julia Hershey (DC Bar # 90020162)  
Sara M. Hanna (DC Bar #90017864)

AKIN GUMP STRAUSS HAUER & FELD  
Robert S. Strauss Tower  
2001 K Street, N.W.  
Washington, DC 20006-1037  
(202)-887-4000  
[mherring@akingump.com](mailto:mherring@akingump.com)  
[mnicely@akingump.com](mailto:mnicely@akingump.com)  
[cwolverton@akingump.com](mailto:cwolverton@akingump.com)  
[amcginn@akingump.com](mailto:amcginn@akingump.com)  
[jdipiero@akingump.com](mailto:jdipiero@akingump.com)  
[mhershey@akingump.com](mailto:mhershey@akingump.com)  
[shanna@akingump.com](mailto:shanna@akingump.com)

*Counsel for Plaintiffs*

Courtney Hostetler (MA Bar #683307)  
John Bonifaz (MA Bar #562478)  
Ben Clements (MA Bar #555802)  
Amira Mattar (NY Bar #5774450)

FREE SPEECH FOR PEOPLE  
48 N. Pleasant St., Suite 304  
Amherst, MA 01002  
617-244-0234  
[chostetler@freespeechforpeople.org](mailto:chostetler@freespeechforpeople.org)  
[jbonifaz@freespeechforpeople.org](mailto:jbonifaz@freespeechforpeople.org)  
[bcllements@freespeechforpeople.org](mailto:bcllements@freespeechforpeople.org)  
[amira@freespeechforpeople.org](mailto:amira@freespeechforpeople.org)

*Counsel for Plaintiffs*

William C. Saturley (NH Bar #2256)  
Nathan R. Fennessy (NH Bar #264672)  
Nicholas A. Dube (NH Bar #27464)

PRETI FLAHERTY  
57 N Main Street  
New Hampshire 03301  
(603)-410-1500  
[WSaturley@preti.com](mailto:WSaturley@preti.com)  
[Nfennesy@preti.com](mailto:Nfennesy@preti.com)  
[Ndube@preti.com](mailto:Ndube@preti.com)

*Counsel for Plaintiffs*