

**IN THE STATE COURT OF KANSAS  
DISTRICT COURT OF SHAWNEE COUNTY**

LEAGUE OF WOMEN VOTERS OF KANSAS,  
LOUD LIGHT, KANSAS APPLESEED  
CENTER FOR LAW AND JUSTICE, INC., and  
TOPEKA INDEPENDENT LIVING RESOURCE  
CENTER, CHARLEY CRABTREE, FAYE  
HUELSMANN, and PATRICIA LEWTER,

Plaintiffs,

v.

SCOTT SCHWAB, in his official capacity as  
Kansas Secretary of State, and DEREK  
SCHMIDT, in his official capacity as Kansas  
Attorney General,

Defendants.

Original Action No. 2021-CV-000299

**PLAINTIFFS' MOTION FOR A PARTIAL TEMPORARY INJUNCTION**

COME NOW the League of Women Voters of Kansas, Loud Light, Kansas Appleseed Center for Law and Justice, Inc., and Topeka Independent Living Resource Center (collectively, "Plaintiffs"), by and through their attorneys at Elias Law Group LLP; Irigonegaray, Turney, & Revenaugh LLP; and Perkins Coie LLP, respectfully move this Court for the issuance of a temporary injunction enjoining enforcement of KSA 25-1124(h) until a final judgment and order is issued in this case. Plaintiffs are entitled to this relief for the reasons set forth in the memorandum of law filed concurrently with this Motion and the supporting exhibits submitted therewith.

WHEREFORE Plaintiffs are prepared to show they satisfy all of the required elements for temporary injunctive relief. Should Defendants oppose this Motion, Plaintiffs respectfully request that the Court schedule the Motion for hearing pursuant to KSA 60-905(a) at the earliest date

possible so that the Court may resolve the Motion with ample time for relief to be implemented ahead of the primary election on August 2, 2022, and the general election on November 8, 2022.

Respectfully submitted, this 7th day of April, 2022.

/s/ Pedro L. Irigonegaray

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*\*Appearing Pro Hac Vic*

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing was electronically transmitted via the Court's electronic filing system to the following:

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