

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:22-cv-00581-PAB

Colorado Montana Wyoming  
State Area Conference of the NAACP,  
League of Women Voters of Colorado, and  
Mi Familia Vota,

Plaintiffs,

v.

United States Election Integrity Plan, Shawn Smith,  
Ashley Epp, and Holly Kasun,

Defendants.

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**MOTION FOR EXPEDITED HEARING ON PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION AND DEFENDANTS' MOTION TO DISMISS**

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Plaintiffs Colorado Montana Wyoming State Area Conference of the NAACP, League of Women Voters of Colorado, and Mi Familia Vota ("Plaintiffs") move the Court for an expedited hearing on Plaintiffs' Motion for Preliminary Injunction and Defendants' Motion to Dismiss and in support thereof state as follows:

**Certificate of Conferral Pursuant to D. Colo. L. Civ. R. 7.1**

Undersigned counsel certifies that she has conferred with opposing counsel regarding this motion. Counsel for Defendants states that it is Defendants' position that the Motion to Dismiss be heard prior to the Motion for Preliminary Injunction.

1. Plaintiffs filed the Complaint in the above-captioned action on March 9, 2022.

2. Thereafter, Plaintiffs moved this Court for a Temporary Restraining Order and Preliminary Injunction, seeking to restrain Defendants from engaging in ongoing illegal voter intimidation in violation of the Voting Rights Act of 1965 and the Ku Klux Klan Act.

3. On April 4, 2022, Defendants filed a Motion to Dismiss Plaintiffs' Complaint for lack of standing.

4. Given that the 2022 elections are fast-approaching, Plaintiffs seek an expedited hearing on Plaintiffs' Motion for Temporary Restraining Order and Defendants' Motion to Dismiss. More specifically, Plaintiffs seek an Order from the Court:

- a. Setting an expedited hearing on Plaintiffs' Motion for Preliminary Injunction and Defendants' Motion to Dismiss;
- b. Setting an expedited briefing schedule for Plaintiffs' Motion for Preliminary Injunction and Defendants' Motion to Dismiss; and
- c. Ordering such other and further relief as the Court deems just and equitable.

Dated: April 7, 2022

LATHROP GPM LLP

By /s/Amy Erickson

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Mi Familia Vota*

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

|                          |  |
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s/Claudia Neal

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**PROPOSED ORDER ON PLAINTIFFS’ MOTION FOR EXPEDITED HEARING ON  
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION AND DEFENDANTS’  
MOTION TO DISMISS**

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The above-captioned matter came before this Court on Plaintiffs Colorado Montana Wyoming State Area Conference of the NAACP, League of Women Voters of Colorado, and Mi Familia Vota (“Plaintiffs”) Motion for Expedited Hearing on Plaintiffs’ Motion for Preliminary Injunction and Defendants’ Motion to Dismiss.

**ORDER**

Based on the foregoing, and all the files, records, and proceedings herein, the Court finds there to be good cause for an expedited hearing on Plaintiffs’ Motion for Preliminary Injunction and Defendants’ Motion to Dismiss. IT IS HEREBY ORDERED that Plaintiffs’ Motion for Expedited Hearing on Plaintiffs’ Motion for Preliminary Injunction and Defendants’ Motion to Dismiss is GRANTED as follows:

1. All parties shall appear before this Court in Room \_\_\_ at \_\_\_ a/pm, on the \_\_\_ day of \_\_\_\_\_ for a hearing on Plaintiff's Motion for a Preliminary Injunction and Defendants' Motion to Dismiss.

2. Papers in opposition to Plaintiffs' Motion for Preliminary Injunction, if any, shall be filed and served via ECF on or before \_\_\_\_\_.

3. Reply papers in support of Plaintiffs' Motion for Preliminary Injunction, if any, shall be filed and served via ECF on or before \_\_\_\_\_.

4. Papers in opposition to Defendants' Motion to Dismiss, if any, shall be filed and served via ECF on or before \_\_\_\_\_.

5. Reply papers in support of Defendants' Motion to Dismiss, if any, shall be filed and served via ECF on or before \_\_\_\_\_.

IT IS SO ORDERED.

Dated this \_\_\_ day of April, 2022

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Judge Philip A. Brimmer

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