

RAÚL R. LABRADOR
ATTORNEY GENERAL

JOSHUA N. TURNER, ISB #12193
Chief of Constitutional Litigation
and Policy

JAMES E. M. CRAIG, ISB #6365
Chief, Civil Litigation and
Constitutional Defense
GREGORY E. WOODARD, ISB #11329
Deputy Attorney General
Office of the Attorney General
P. O. Box 83720
Boise, ID 83720-0010
Telephone: (208) 334-2400
Facsimile: (208) 854-8073
josh.turner@ag.idaho.gov
james.craig@ag.idaho.gov
greg.woodard@ag.idaho.gov

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

MARCH FOR OUR LIVES IDAHO and
IDAHO ALLIANCE FOR RETIRED
AMERICANS,

Plaintiffs,

v.

PHIL MCGRANE, in his official
capacity as the Idaho Secretary of
State,

Defendant.

Case No. 1:23-cv-00107-AKB

**NOTICE OF SUPPLEMENTAL
AUTHORITY**

Defendant Phil McGrane gives notice of the supplemental authority attached as Exhibit A to this notice for the Court's consideration with respect to both parties' motions for summary judgment now pending at Dkt. 54 and Dkt. 55. The Idaho Legislature has amended Idaho Code § 49-2444(22), removing the requirement that a person must not possess a driver's license for six (6) months before applying for a no-fee identification card through the Idaho Department of Transportation. Idaho House Bill 532 (designated as 2024 Idaho Sess. Laws c. 31). The law will be effective July 1, 2024.¹

DATED: March 26, 2024.

STATE OF IDAHO
OFFICE OF THE ATTORNEY GENERAL

By: /s/ James E. M. Craig
JAMES E. M. CRAIG
Chief, Civil Litigation and
Constitutional Defense

¹ Session Laws have not yet been printed for the 2024 legislative session, and accordingly the Bill's enacted status may be found at the following website: <https://tinyurl.com/yx46jh2z>.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 26, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following persons:

Terri R. Pickens
terri@pickenslawboise.com

Justin Baxenberg
jbaxenberg@elias.law

Elisabeth Frost
efrost@elias.law

Daniel Cohen
dcohen@elias.law

David R. Fox
dfox@elias.law

Qizhou Ge
age@elias.law

Attorneys for Plaintiffs

By: /s/ James E. M. Craig
JAMES E. M. CRAIG
Chief, Civil Litigation and
Constitutional Defense