

STATE OF MINNESOTA  
COUNTY OF RAMSEY

DISTRICT COURT  
SECOND JUDICIAL DISTRICT  
Case Type: Civil Other/Misc.

MINNESOTA ALLIANCE FOR RETIRED  
AMERICANS EDUCATIONAL FUND,  
TERESA MAPLES, and KHALID  
MOHAMED,

Plaintiffs,

v.

STEVE SIMON, in his official capacity as  
Minnesota Secretary of State,

Defendant.

Case No. 62-cv-24-854

Assigned Judge: Hon. Edward Sheu

**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR TEMPORARY  
INJUNCTION**

TO: DEFENDANT STEVE SIMON, IN HIS OFFICIAL CAPACITY AS MINNESOTA  
SECRETARY OF STATE

PLEASE TAKE NOTICE that at 10:30 a.m. on May 23, 2024, before the Honorable  
Edward Sheu of the Ramsey County District Court, Plaintiffs Minnesota Alliance for Retired  
Americans Educational Fund, Teresa Maples, and Khalid Mohamed will move—and hereby do  
move—for a temporary injunction under Rule 65 of the Minnesota Rules of Civil Procedure to:

1. Enjoin Defendant and his respective agents, officers, employees, successors, and all  
persons acting in concert with each or any of them from enforcing the provisions of  
Minn. Stat. § 203B.07, Minn. Stat. § 203B.121, Minn. R. 8210.0600, Minn. R.  
8210.2450, and any other provisions necessary, to the extent that the provisions require  
the rejection of an absentee ballot if the return envelope does not contain a statement  
signed by a registered Minnesota voter, notary, or other official authorized to  
administer oaths (the “witness requirement”).

2. Order Defendant and his respective agents, officers, employees, successors, and all persons acting in concert with each or any of them to accept and count absentee ballots that otherwise comply with the requirements for absentee voting under Minnesota law, regardless of whether they comply with the witness requirement.
3. Order Defendant and his respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them to permit first-time registrants to submit a copy of a proof of residence document under Minn. Stat. § 201.061, subdiv. 3 with their absentee registration application as an alternative to complying with the witness requirement.
4. Awarding Plaintiffs such other, different, or further temporary relief as the Court may deem just and equitable.

This motion is based upon the memoranda of law and accompanying evidence, any further evidence and arguments to be presented at or before the hearing, and all of the files, records and proceedings herein.

Dated: May 2, 2024

**GREENE ESPEL PLLP**

/s/ Sybil L. Dunlop

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**ACKNOWLEDGEMENT**

The undersigned hereby acknowledges that pursuant to Minn. Stat. § 549.211, subdiv. 3, sanctions may be imposed if, after notice and a reasonable opportunity to respond, the Court determines that the undersigned has violated the provisions of Minn. Stat. § 549.211, subdiv. 2.

/s/ Sybil L. Dunlop

Sybil L. Dunlop