

**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

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