

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**LEAGUE OF WOMEN VOTERS OF
NEW HAMPSHIRE, *et al.*,**

Plaintiffs,

v.

STEVE KRAMER, *et al.*,

Defendants.

Civil Action No. 1:24-cv-73-SM-TSM

PLAINTIFFS' AMENDED MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff's 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, Voice Broadcasting Corporation, 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 without the express, prior written consent of the individual or entity upon whose half the communication is being sent; 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: June 7, 2024

Respectfully submitted,

/s/ Mark R. Herring

Mark R. Herring (DC Bar #90013124)
Matthew R. Nicely (DC Bar #430564)
Caroline L. Wolverson (DC Bar #496433)
Amanda S. McGinn (DC Bar #1049085)
Joseph T. DiPiero (DC Bar #1618536)
Maria Julia Hershey (DC Bar # 90020162)
Sara M. Hanna (DC Bar #90017864)

AKIN GUMP STRAUSS HAUER & FELD
Robert S. Strauss Tower
2001 K Street, N.W.
Washington, DC 20006-1037
(202)-887-4000
mherring@akingump.com
mnicely@akingump.com
cwolverton@akingump.com
amcginn@akingump.com
jdiplero@akingump.com
mhershey@akingump.com
shanna@akingump.com

Counsel for Plaintiffs

Courtney Hostetler (MA Bar #683307)
John Bonifaz (MA Bar #562478)
Ben Clements (MA Bar #555802)
Amira Mattar (NY Bar #5774450)

FREE SPEECH FOR PEOPLE
48 N. Pleasant St., Suite 304
Amherst, MA 01002
617-244-0234
chostetler@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org
amira@freespeechforpeople.org

Counsel for Plaintiffs

William C. Saturley (NH Bar #2256)
Nathan R. Fennessy (NH Bar #264672)
Nicholas A. Dube (NH Bar #27464)

PRETI FLAHERTY
57 N Main Street
New Hampshire 03301
(603)-410-1500
WSaturley@preti.com
Nfennessy@preti.com
Ndube@preti.com

Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned hereby certified that on June 7, 2024, the foregoing was electronically filed with the Court and served upon the following:

Boyd Garriott
Frank Scaduto
Michele E. Kenney
Thomas M. Johnson, Jr.
Wiley Rein LLP
2050 M Street NW
Washington, DC 20036
210-833-5573

Counsel for Defendant Lingo Telecom, LLC
Via ECF System

Wayne E. George
Ezra D. Church
Terese M. Schireson
Morgan Lewis & Bockius LLP
One Federal St
Boston, MA 02110-4104

*Counsel for Defendants Life Corporation and
Voice Broadcasting Corporation*
Via ECF System

Steve Kramer
20 Cloverleaf Drive
New Fairfield, CT 06812
Via US Mail

A true and correct copy was also transmitted via electronic mail to Steve Kramer at gotvcalls@gmail.com.

Respectfully submitted,

/s/ Mark R. Herring
Mark R. Herring (DC Bar #90013124)