

**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

**DEFENDANTS' LIFE CORPORATION AND VOICE BROADCASTING OBJECTION
TO PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

NOW COME the defendants Life Corporation (herein "Life") and Voice Broadcasting (herein "Voice"), by and through counsel, and respectfully submit the within Objection to Plaintiffs' Motion for Preliminary Injunction, stating as follows:

1. The Court should deny the motion for preliminary injunction because Plaintiffs have failed to come forward with evidence to sustain the substantial burden required to obtain the extraordinary remedy of preliminary injunctive relief.

2. In particular, Plaintiffs are unlikely to succeed on the merits of their claims against Life and Voice because: (a) they have failed to identify an actual, concrete injury sufficient to confer standing; (b) they have failed to articulate how Life or Voice could be liable under the Voting Rights Act ("VRA"); and (c) they have no claim against Life or Voice under either the Telephone Consumer Protection Act ("TCPA") or New Hampshire Election Laws.

3. Moreover, Plaintiffs have not shown a risk of irreparable harm where neither Life nor Voice made the "Subject Call" on and neither is working with Defendant Kramer any longer.

4. The balance of equities weighs clearly in Life and Voice's favor. Plaintiffs' proposed injunction would harm the public interest rather than further it.

5. The Court should deny the plaintiffs' Motion for Preliminary Injunction, for reasons more fully set forth in the accompanying Memorandum of Law.

WHEREFORE, the defendant Life Corporation respectfully prays this Honorable Court:

- A. Deny the plaintiffs' Motion for Preliminary Injunction; and
- B. Grant such other and further relief as is just and equitable.

DATE: June 28, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this date upon all counsel of record via the ECF filing system.

/s/ Benjamin T. King
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