

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

SUSAN JANE HOGARTH,

Plaintiff,

v.

KAREN BRINSON BELL, et al.,

Defendants.

Case No.: 5:24-cv-00481-LF

Hon. Louise W. Flanagan

**PLAINTIFF'S MOTION TO EXPEDITE
CONSIDERATION OF PRELIMINARY
INJUNCTION MOTION**

In accordance with Rule 16 of the Federal Rules of Civil Procedure and the Court's inherent authority to manage its docket, Plaintiff Susan Hogarth respectfully moves to expedite consideration of her Motion for Preliminary Injunction [ECF No. 9].¹ Pursuant to Local Rule 7.1(e), Plaintiff has filed a memorandum in support of this motion [ECF No. 11]. As set out in that memorandum, expedited consideration is necessary to ensure that, for the general election on November 5, 2024, North Carolina voters—Hogarth included—can take and share photos with or of their completed ballots, inside and outside the voting enclosure, without fear of prosecution. To give voters notice of their rights and the opportunity to engage in this protected form of expression, including absentee voters who must mail their ballots in time to be received on Election Day, Hogarth respectfully moves this Court to set a hearing for no later than **October 15, 2024**, and rule on her preliminary injunction motion no later than **October 29, 2024**.

¹ Pursuant to Local Rule 7.1, Plaintiff's counsel has been unable to meet and confer with counsel for the opposing parties because they have not yet appeared. Plaintiff will serve this motion and supporting memorandum pursuant to Fed. R. Civ. P. 4, along with the summons and complaint.

Dated: August 27, 2024

Respectfully Submitted,

/s/ James M. Dedman IV

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*Special Appearance Pursuant to Local
Rule 83.1(e)

**Special Appearance Pursuant to
Local Rule 83.1(e) Forthcoming

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, Jeffrey D. Zeman, hereby certify that on August 27, 2024, I submitted the foregoing to the Clerk of the Court via the District Court's CM/ECF system, and this document will be served personally on all Defendants with the Summons & Complaint. Once it is served, we will file an affidavit of service.

/s/ Jeffrey D. Zeman
JEFFREY D. ZEMAN
FOUNDATION FOR INDIVIDUAL
RIGHTS AND EXPRESSION

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