

VIRGINIA:

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

**REPUBLICAN NATIONAL)
COMMITTEE; REPUBLICAN PARTY)
OF VIRGINIA; BEN CLINE; H.)
MORGAN GRIFFITH; JENNIFER A.)
KIGGANS; JOHN J. MCGUIRE;)
ROBERT J. WITTMAN; MARK)
DANIEL; DENNIS FREE; MIKI)
MILLER; CAREY ALLEN; RICK)
BUCHANAN; JOHN MASSOUD; BEN)
HAZEKAMP; SUSAN VALENTINE;)
MATT BRAYNARD; CHRIS)
WINSLOW; WENDELL WALKER;)
MIKE ZIEGENFUSS; WILLIE)
DEUTSCH; LAIRD KNIGHTS;)
STEVEN STATZER; and CREAL)
FRENCH,)**

Plaintiffs,

v.

**VIRGINIA STATE BOARD OF)
ELECTIONS; VIRGINIA)
DEPARTMENT OF ELECTIONS;)
STEVEN KOSKI, in his official capacity)
as Commissioner of the Virginia)
Department of Elections; JOHN)
O'BANNON, in his official capacity as)
Chairman of the Virginia State Board)
of Elections; ROSALYN R. DANCE, in)
her official capacity as Vice Chair of the)
Virginia State Board of Elections;)
GEORGIA ALVIS-LONG, in her official)
capacity as Secretary of the Virginia)
State Board of Elections; and)
CHRISTOPHER P. STOLLE, in his)
official capacity as Member of the)
Virginia State Board of Elections.)**

Defendants.

Case No. CL26001208-00

**MOTION FOR
PRELIMINARY INJUNCTION**

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Plaintiffs move for a preliminary injunction as to Counts 1 and 2 of their Complaint. *See* Va. Sup. Ct. R. 3:26(c)-(d). As the attached memorandum in support of this motion shows, Plaintiffs will likely succeed on the merits of these claims and suffer irreparable harm without this relief. All governing factors including a balance of hardships favor an injunction, and it is in the public interest. Plaintiffs respectfully request a hearing on this motion on April 15, 2026, or as soon thereafter as they may be heard.

Respectfully Submitted,

March 31, 2026

/s/ Katherine L. McKnight

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/s/ William H. Hurd

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