

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF NORTH CAROLINA**

North Carolina Alliance for Retired
Americans, *et al.*,

Plaintiffs,

v.

North Carolina State Board of Elections, *et al.*,

Defendants.

Case No. 1:26-cv-00965-WO-JGM

**EXPEDITED CONSIDERATION
REQUESTED**

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs, for the reasons set forth herein and in the memorandum of law filed concurrently with this motion, and as supported by the materials submitted therewith, respectfully move for a preliminary injunction on Counts I–IV of their Complaint for Declaratory and Injunctive Relief. Plaintiffs are likely to succeed on the merits of their claims and will suffer irreparable harm without a preliminary injunction, and the balance of hardships and public interest support granting Plaintiffs' motion.

Plaintiffs therefore request that the Court issue a preliminary injunction enjoining Defendants, their agents, officers, employees, and successors, and all persons acting in concert with them, from enforcing or otherwise giving any effect to the Sealing Requirement and the Signature Verification Requirement, as set forth in Revised Numbered Memo 2021-03, during the November 2026 general election and all future elections during the pendency of this proceeding.

Plaintiffs also respectfully request that the Court set an expedited briefing schedule and hearing and issue a decision as soon as possible thereafter. Absent expedited relief, Plaintiffs will continue to suffer irreparable harm, as detailed in the accompanying memorandum and supporting declarations. Under state law, North Carolina's county boards of elections are required to begin meeting weekly starting on September 29, 2026, to process absentee ballots, making expedited relief all the more necessary. *See* N.C.G.S. § 163-230.1(f).

Dated: September 28, 2026

Respectfully submitted,

/s/ Narendra K. Ghosh

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**Notice of Special Appearance
Forthcoming*

Counsel for Plaintiffs

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that the foregoing document was electronically filed with the Clerk of Court using the CM/ECF system, emailed this day to the agents/officers of the Defendants, and will be sent by FedEx on September 29, 2026, to the agents/officers of the Defendants, addressed as follows:

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This the 28th day of September, 2026.

/s/ Narendra K. Ghosh