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 Barry A. Bostrom (Ind. State Bar No.11912-84)*
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7 Timothy D. Chandler (Cal. State Bar No. 234325)**
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 10 Counsel for All Plaintiffs

11 **Pro Hac Vice Application Pending*
 12 *** Designated Counsel for Service*

13 **United States District Court**
 14 **Eastern District of California**
 15 **Sacramento Division**

<p>16 ProtectMarriage.com, et al., 17 <i>Plaintiffs,</i> 18 <i>v.</i> 19 Debra Bowen, et al., 20 <i>Defendants.</i></p>	<p>Case No. 2:09-CV-00058-MCE-DAD PLAINTIFFS’ NOTICE OF MOTION AND MOTION TO EXPEDITE Date: TBD Time: TBD Honorable Morrison C. England, Jr.</p>
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1 TO DEFENDANTS AND THEIR ATTORNEY OF RECORD:

2 YOU ARE HEREBY GIVEN NOTICE THAT on A DATE TO BE DETERMINED BY
3 COURT ORDER, before the Honorable Morrison C. England, Jr. in Courtroom TO BE
4 DETERMINED BY COURT ORDER of the United States District Court for the Eastern District
5 of California, Sacramento Division, located at 501 I Street, Sacramento California 95814,
6 Plaintiff ProtectMarriage.com - Yes on 8, a Project of California Renewal
7 (“ProtectMarriage.com”), National Organization for Marriage California - Yes on 8, Sponsored
8 by National Organization for Marriage (“NOM-California”), and John Doe #1, an individual,
9 and as a representative of the Class of Major Donors, will and hereby do move to expedite this
10 action.

11 This motion to expedite is made pursuant to 28 U.S.C. § 1657, and on the grounds
12 specified in this notice of motion and motion, Plaintiffs’ Memorandum in Support of Motion to
13 Expedite, the declarations filed in support Plaintiffs’ Motion for Preliminary Injunction, the
14 Complaint, and such other and further evidence as may be presented to the Court at the time of
15 the hearing.

16 Plaintiffs ProtectMarriage.com, NOM-California, and the Class of Major Donors hereby
17 move to expedite this action.

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19 Dated this 9th day of January, 2009.

20 Respectfully submitted,

21 _____
22 /s/ Timothy D. Chandler
23 Timothy D. Chandler (Cal. Bar No. 234325)
24 ALLIANCE DEFENSE FUND
25 101 Parkshore Drive, Suite 100
26 Folsom, CA 95630
27 Counsel for All Plaintiffs
28 Designated Counsel for Service

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Counsel for All Plaintiffs
**Pro Hac Vice Application Pending*

**Plaintiffs’ Notice of Motion and
Motion to Expedite**

1 **PROOF OF SERVICE**

2 I, Timothy D. Chandler, am over the age of 18 years and not a party to the within action. My
3 business address is 101 Parkshore Drive, Suite 100; Folsom, California 95630.

4 On January 9, 2009, I electronically filed the foregoing document described as Plaintiffs'
5 Notice of Motion and Motion to Expedite, which will be served on all Defendants along with the
6 Summons and Amended Complaint.

7 I declare under penalty of perjury under the laws of the State of California that the above is true
8 and correct. Executed on January 9, 2009 at Folsom, California.

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10 s/Timothy D. Chandler
11 Timothy D. Chandler (CA Bar No. 234325)
12 Attorney for Plaintiff
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