

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

)	
Georgia Latino Alliance for Human)	
Rights, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	Case No. 1:11-cv-1804-TWT
v.)	
)	
Governor Nathan Deal, <i>et al.</i> ,)	
)	
Defendants.)	
)	

**PLAINTIFFS’ NOTICE OF MOTION AND MOTION FOR
PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that Plaintiffs Georgia Latino Alliance for Human Rights, et al., hereby move the Court for a preliminary injunction enjoining all Defendants from enforcing Georgia House Bill 87 (“HB 87”). As set forth in detail in the Memorandum in Support of Plaintiffs’ Motion for Preliminary Injunction filed herewith, Plaintiffs have established that they are likely to succeed on the merits of their claims that HB 87 violates the Supremacy Clause, the Fourth Amendment, the constitutional right to travel, and the separation-of-powers requirement of Article I, Section II, Paragraph 3 of the Georgia Constitution; that Plaintiffs will suffer irreparable harm if the Court does not enjoin HB 87; that

Defendants will suffer little to no harm if the Court were to preserve the status quo pending adjudication of this matter on the merits; that the balance of hardships tips strongly in their favor; and that a preliminary injunction in this case advances the public interest.

Dated: June 8, 2011

Respectfully submitted,¹

/s/ Michelle Lapointe
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On behalf of Attorneys for Plaintiffs

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¹ Counsel certifies this document has been prepared in accordance with L.R. 5.1.

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*Application for admission *pro hac vice* pending

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification to the following attorney for Defendants Deal, Olens, Reese, and Beatty, to whom a copy is also being hand-delivered today:

Devon Orland
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Attorney for Defendants Deal, Olens, Reese and Beatty

I hereby certify that a copy of the foregoing is being hand-delivered on this date to the following non-CM/ECF participant:

Falecia Stewart
Executive Director, Housing Authority of Fulton County
HAFC Headquarters
4273 Wendell Drive
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This 8th day of June, 2011.

/s/ Michelle R. Lapointe