

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PERSONAL PAC, an Illinois not for profit )  
corporation, MARCENA W. LOVE, )  
GRACE ALLEN NEWTON, )

Plaintiffs, )

v. )

WILLIAM M. MCGUFFAGE, Chairman of )  
the Illinois State Board of Elections; )  
JESSE R. SMART, Vice Chairman of the )  
Illinois State Board of Elections; )  
HAROLD D. BYERS, Member of the )  
Illinois State Board of Elections; )  
BETTY J. COFFRIN, Member of the )  
Illinois State Board of Elections; )  
ERNEST L. GOWEN, Member of the )  
Illinois State Board of Elections; )  
JUDITH C. RICE, Member of the )  
Illinois State Board of Elections; )  
BRYAN A. SCHNEIDER, Member of the )  
Illinois State Board of Elections; )  
CHARLES W. SCHOLZ, Member of the )  
Illinois State Board of Elections, all in )  
their official capacities, )

Defendants. )

) Judge Marvin E. Aspen  
) Magistrate Judge Sheila M Finnegan  
)  
) No. 12 CV 1043  
)

**PLAINTIFFS’ MOTION FOR A PRELIMINARY INJUNCTION OR,  
IN THE ALTERNATIVE, FOR EXPEDITED PERMANENT  
INJUNCTIVE RELIEF**

Plaintiffs Personal PAC, Marcena W. Love, and Grace Allen Newton

(collectively, “Plaintiffs”), move for a preliminary injunction or, in the alternative,

for expedited entry of a permanent injunction without entry of a preliminary injunction first. *See* Fed. R. Civ. Proc. 65(a).

For the reasons stated in the accompanying memorandum in support, Plaintiffs ask that the Court preliminarily or permanently enjoin Defendants from enforcing: (1) the contributions limits contained in 10 ILCS 5/9-8.5(d), and any applicable rules and regulations regarding that provision, when applied to funds raised, maintained, and spent solely for the purpose of independent expenditures, and (2) the prohibition in 10 ILCS 5/9-2(d), and any applicable rules and regulations regarding that provision, against the establishment or maintenance of “more than one PAC,” by any person natural person, trust, partnership, committee, association, corporation, or other organization or group of persons to the extent it prohibits the formation of an additional PAC created solely with funds raised, maintained, and spent solely for the purpose of independent expenditures.

Dated: February 14, 2012

Respectfully Submitted,

/s/ Juliet V. Berger-White

Matthew J. Piers  
Joshua Karsh  
Juliet Berger-White  
HUGHES SOCOL PIERS  
RESNICK & DYM, LTD.  
70 W. Madison, Suite 4000  
Chicago, IL 60602  
312.580.0100