

FILED

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

2012 MAY 14 A 10:55

U.S. DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

LIBERTARIAN PARTY OF VIRGINIA and
DARRYL BONNER

Plaintiffs,

v.

CIVIL ACTION NO. 3:12cv367

CHARLES JUDD , KIMBERLY BOWERS ,
and DON PALMER, in their official capacities
as members of the Virginia State Board of
Elections,

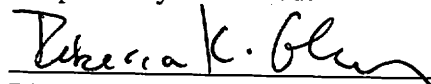
Defendants

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P. 65(a), the plaintiffs, by counsel, respectfully request the Court to grant a preliminary injunction prohibiting the defendants from enforcing the portion of Va. Code Ann. § 24.2-543 requiring petition circulators for independent presidential candidates to be residents of Virginia. The grounds for this Motion are set forth in the accompanying brief.

Dated: May 14, 2012

Respectfully submitted:



REBECCA K. GLENBERG (VSB No. 44099)
American Civil Liberties Union of Virginia
Foundation, Inc.

530 East Main Street, Suite 310
Richmond, Virginia 23219

(804) 644-8080

(804) 649-2733 (fax)

rglenberg@acluva.org

KATIE O'CONNOR (*pro hac vice* pending)
American Civil Liberties Union Foundation, Inc.
230 Peachtree Street, NW, Suite 1440
Atlanta, Georgia 30303
(404) 523-2721
(404) 653-0331 (fax)
koconnor@aclu.org

ATTORNEYS FOR THE PLAINTIFFS