

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Laura Boustani, Mutsuyo Okumura Unger,)	
Chia-Min T. Chen, Mary Savas, Efty)	
Simakis, Sophia Loizos, Paramjit Singh,)	
Joseph Hajjar, Catherine Ma, Sagarika)	
Nayak, Eduardo A. Romero, Karil)	
Bialostosky, Dagmar Celeste, Ali AlHaddad)	
MD, Sawsan Alhaddad MD, Gia Hoa Ryan,)	
Margaret Wong, P.S. Murthy, Asian)	
American Bar Association of Ohio, The)	
Federation of India Community Association,)	
Service Employees International Union)	
District 1199, American-Arab Anti-)	Civil Action No. 06-2065
Discrimination Committee, Greater Toledo)	
Association of Arab Americans, Council on)	
American-Islamic Relations Ohio,)	
)	
Plaintiffs,)	
)	
v.)	
)	
J. Kenneth Blackwell,)	
)	
Defendant.)	

PLAINTIFFS’ MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs respectfully move for the entry of a preliminary injunction under Fed. R. Civ. P. 65(a)(2) enjoining defendant Blackwell, his agents, employees and attorneys, and all other

persons in active concert or participation with them from (1) enforcing or attempting to enforce or apply the 2006 amendment to § 3505.20(A)(4) of the Ohio Revised Code in any election in the State of Ohio, including, but not limited to, the November 7, 2006 general election, and any runoff or special election thereafter, or (2) discouraging, interfering with or preventing any person who is lawfully registered from voting any such elections, pending a final trial on the merits of plaintiffs' application for a permanent injunction or further Order of this Court.

WHEREFORE, plaintiffs respectfully pray that this Motion for a Preliminary Injunction be granted as prayed herein.

Respectfully submitted,

/s/ Meredith Bell-Platts
Meredith Bell-Platts (OH 0072917)
Laughlin McDonald
Neil Bradley
ACLU Voting Rights Project
2600 Marquis One Tower
245 Peachtree Center Avenue
Atlanta, GA 30303
(404) 523-2721
(404) 653-0331 (facsimile)
mbell@aclu.org
lmcdonald@aclu.org
nbradley@aclu.org

Subodh Chandra (OH 69233)
2275 Chestnut Hills Drive
Cleveland, OH 44106-4602
(216) 965-6463
(216) 721-4008 (facsimile)
Subodh.Chandra@StanfordAlumni.org

Carrie L. Davis (OH 77041)
ACLU of Ohio
4506 Chester Ave
Cleveland, OH 44103
(216) 472-2220
(216) 472-2210 (facsimile)
cdavis@acluohio.org

Daniel P. Tokaji
The Ohio State University
Moritz College of Law*
55 W. 12th Ave.
Columbus, OH 43210
(614) 292-6566
(614) 688-8422 (facsimile)
tokaji.1@osu.edu

* Institutional affiliation provided for purposes
of identification only

Jon M. Greenbaum
Benjamin J. Blustein
Lawyers' Committee for Civil Rights under Law
1401 New York Avenue, NW
Suite 400
Washington, DC 20005
(202) 662-8315
(202) 662-8600 (facsimile)
jgreenbaum@lawyerscommittee.org
bblustein@lawyerscommittee.org

Wendy Weiser
Justin Levitt
Brennan Center for Justice
NYU School of Law
161 Avenue of the Americas
12th Floor
New York, NY 10013
(212) 998-6730
(212) 995-4550 (facsimile)
wendy.weiser@nyu.edu
justin.levitt@nyu.edu

Counsel for Plaintiffs

Certificate of Service

This is to certify that a copy of the foregoing was served upon the defendant by hand delivery addressed as follows:

J. Kenneth Blackwell
Ohio Secretary of State
Borden Building
180 East Broad Street
Columbus, OH 43215

This 29th day of August 2006, at Atlanta, Georgia.

/s/ Meredith Bell-Platts
Meredith Bell-Platts (OH 0072917)
ACLU Voting Rights Project
2600 Marquis One Tower
245 Peachtree Center Avenue
Atlanta, GA 30303
(404) 523-2721
(404) 653-0331 (facsimile)
mbell@aclu.org

Counsel for the Plaintiffs