

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO**

LAURA BOUSTANI, *et al.*,

*Plaintiffs,*

v.

FRANK LAROSE, in his official capacity as  
Ohio Secretary of State,

*Defendant.*

Case No. 1:06-cv-02065

**PLAINTIFFS' EMERGENCY MOTION TO EXPEDITE**

For the reasons set forth below, Plaintiffs respectfully move this Court for a modified briefing schedule to allow for expedited consideration of their emergency motion to enforce this Court's previous judgment. Plaintiffs seek to expedite the resolution of their motion for the same reason they seek to enforce the judgment: to prevent ongoing, severe constitutional violations by the Ohio Secretary of State.

As Plaintiffs' motion illustrates, the Secretary has reimplemented the very voter challenge process that this Court has permanently enjoined as unconstitutional. Voting is already underway in Ohio, and Election Day is now less than two weeks away. Voters are vulnerable to being challenged in an unconstitutional manner absent quick action from this Court to enforce the permanent injunction it has already entered.

For the foregoing reasons, Plaintiffs respectfully request this Court to order that:

1. Defendants file their Opposition to Plaintiffs' Motion to Enforce this Court's Judgment at or before 11:59 P.M. on Thursday, October 24, 2024; and
2. Plaintiffs file any Reply Brief at or before 11:59 P.M. on Friday, October 25, 2024.

This expedited schedule would allow the matter to be fully briefed and decided by the week of October 28, 2024, halt any harm that is presently occurring during early voting, and ensure that the Secretary's violation of this Court's injunction does not impact voters being challenged at their polling place on Election Day on Tuesday, November 5, 2024.

Date: October 23, 2024

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\*Motion *pro hac vice* forthcoming

**CERTIFICATE OF SERVICE**

I, Freda Levenson, an attorney admitted to practice before this Court, hereby certify that on October 23, 2024, the foregoing Emergency Motion to Expedite was filed with the Court. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties for whom counsel has entered an appearance. The parties may access this filing through the Court's electronic filing system.

Date: October 23, 2024

Respectfully submitted,

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