

UNITED STATES DISTRICT COURT

**WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MARTHA HAYES,
Plaintiff

Case no. 1:07-cv-1237

v.

HON. Robert J. Jonker

MICHIGAN DEMOCRATIC PARTY,

and

**THE STATE OF MICHIGAN AND TERRI LYNN LAND,
solely in her official capacity as Secretary of State of Michigan
JOINTLY AND SEVERALLY,**

Defendants

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**MOTION FOR A PRELIMINARY INJUNCTION
AND OTHER RELIEF**

EXPEDITED CONSIDERATION REQUESTED

1. Under Fed.R.Civ.Pro. 65 Plaintiff brings her Motion for a Preliminary Injunction. Plaintiff's Complaint challenges the Constitutionality under the First and Fourteenth Amendments to the U.S. Constitution of Michigan 2007 PA 52, the Act that established the Michigan Presidential Primary.

2. The grounds for the Motion are as stated in the brief that has been filed in support of this motion.

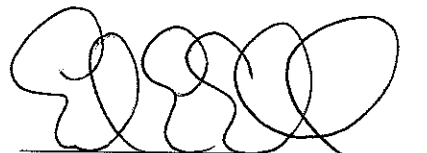
3. Expedited consideration of this Motion is being requested for the reason that the Presidential Primary is scheduled for January 15, 2008.

4. The relief being requested is as states in § VIII of the brief.

5. The brief that Plaintiff has filed in support of her motion is 30 pages in length, exclusive of the Table of Contents and the Index of Authorities. Pursuant to W.D. Mich. LCivR 71.(c) Plaintiff requests that this Court accept a brief of this length.

6. Counsel for Plaintiff is sending in the mail a letter to all Counsel of Record requesting concurrence in the relief sought in this motion. Given the nature of the litigation and the nature of the relief sought, given the need for expedited consideration, and given the presence of the Holiday, Counsel for Plaintiff has not attempted to obtain concurrence prior to filing this motion.

Dated: December 26, 2007



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