

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI

JERRY YOUNG and
CHRISTY COLLEY

Plaintiffs,

v.

DELBERT HOSEMANN, in his official
capacity as the Secretary of State of Mississippi;
KRISTIN BUSE, DEBBY McCAFFERTY,
JOHN M. WAGES, HARRY GRAYSON, Jr., and
JOHN H. EDWARDS, in their official capacities
as Election Commissioners of Lee County; and
VIVIAN BURKLEY, JULIUS HARRIS,
JIMMY HERRON, BONNIE G. LAND, and
RONALD McMINN, in their official capacities as
Election Commissioners in Panola County,

Defendants.

CIVIL ACTION

NO. 3:08 CV-567 TSL-JCS

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Jerry Young and Christy Colley, by and through counsel, hereby move for entry of a preliminary injunction under Fed. R. Civ. P. 65(a) enjoining Defendants, their agents, employees, and all other persons in active concert or participation with them from discouraging, interfering with, or preventing any person convicted of a crime from registering to vote in federal elections for president and vice president of the United States.

Plaintiffs also request that this Court order Defendants to: (1) extend the voter registration deadline to October 20, 2008 to allow Plaintiffs and all similarly situated persons the opportunity to register to vote; (2) require that county registrars extend their office hours to allow citizens to register to vote; (3) amend the Mississippi voter

registration application form and drivers license application form to reflect that individuals convicted of a crime may still vote in federal elections for president and vice president of the United States; and (4) disseminate public service announcements throughout the State of Mississippi that inform citizens of the extension of the voter registration deadline, the extended office hours of county registrars, and the above-referenced amendment to the voter registration application form.

WHEREFORE, Plaintiffs respectfully request that this Court grant their Motion for Preliminary Injunction.

Respectfully Submitted,

By: /s Kristy L. Bennett
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*Pro Hac Vice Motions to Follow