

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

RUTHELLE FRANK, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

SCOTT WALKER, in his official capacity as  
Governor of the State of Wisconsin, et al.,

Defendants.

Civil Action No. 2:11-cv-01128 (LA)

**ORAL ARGUMENT  
REQUESTED**

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION, LEAVE TO FILE  
SUPPLEMENTAL PLEADING, AND CLASS CERTIFICATION**

Plaintiffs, through their counsel, respectfully move this Court to grant Plaintiffs' motion for a preliminary injunction, leave to file a supplemental pleading, and class certification. Plaintiffs request a preliminary injunction ordering Defendants and their agents to:

- (1) Create an affidavit in simple language that would allow voters without acceptable identification for voting to cast a regular ballot at the polling place or an absentee ballot, by affirming that they face a "reasonable impediment" to obtaining acceptable identification. The form should have boxes that a voter may check for "lack of transportation," "disability or illness," "lack of birth certificate," "work schedule," "family responsibilities," and "other reasonable impediment." The form shall require a further brief written explanation from the voter only if he or she checks the "other reasonable impediment" box on the form. Any reason that the voter subjectively deems reasonable should suffice.

(2) Send an individualized mailing to all registered voters who do not appear in the DMV database as having acceptable photo ID, informing them about the voter ID law and the affidavit option.

(3) Include the affidavit option in any publicity materials related to the voter ID law.

In support of this Motion, Plaintiffs concurrently submit a Memorandum of Law in support of the Motion and a Proposed Order, which are hereby incorporated within this Motion by reference.

Dated this 10th day of June 2016,

Respectfully submitted,

/s/ Sean J. Young

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