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MONTANA THIRTEENTH JUDICIAL DISTRICT COURT
COUNTY OF YELLOWSTONE

Montana Democratic Party and Mitch Bohn, Plaintiffs, Western Native Voice, Montana Native Vote, Blackfeet Nation, Confederated Salish and Kootenai Tribes, Fort Belknap Indian Community, and Northern Cheyenne Tribe, Plaintiffs, Montana Youth Action, Forward Montana Foundation, and Montana Public Interest Research Group, Plaintiffs, vs. CHRISTI JACOBSEN, in her official capacity as Montana Secretary of State, Defendant.	)	Cause No. DV 21-0451 Hon. Michael Moses ***WESTERN NATIVE VOICE* PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANT'S MOTION TO SUSPEND PRELIMINARY INJUNCTION PENDING APPEAL**

INTRODUCTION[1]

The people of the State of Montana have relied upon Election Day Registration ("EDR") for over fifteen years, rejecting previous attempts to limit it as recently as 2014. EDR contributes to an appreciable increase in the number of people who are able to vote in each election, sometimes at a number greater than margins of victory for certain offices. The Secretary, ignoring the standards under Montana law for the suspension of an injunction, spills ink almost exclusively on administrative concerns, while ignoring the fundamental nature of the right to suffrage under the Montana Constitution. Even with this limited and misguided focus on administrative burden, the Secretary ignores the fifteen years of experience that voters, election

[1] *Western Native Voice* Plaintiffs challenged only HB 176 and HB 530, § 2, so only offer response as it relates to those two enactments. Defendant does not seek to stay the injunction of HB 530, § 2, and the *Western Native Voice* Plaintiffs commend the Secretary's decision in light of Native voters' proven reliance on absentee ballot assistance.

administrators, and the Secretary's Office have with EDR. The Secretary and election administrators know how to run elections with EDR in place, have done so smoothly for over a decade, and any claims to the contrary should be viewed with utmost skepticism. Reversion to the status quo as a factual matter is straightforward: Simply run the 2022 elections in the same way that the last statewide elections were run.

As she did in opposition to Plaintiffs' granted motions for preliminary injunction, the Secretary ignores governing Montana law as to what constitutes the status quo. The "status quo" is the state of Montana law before the challenged enactments were passed, as that is the "last actual, peaceable, non[-]contested condition which preceded the pending controversy." *Driscoll v. Stapleton*, 2020 MT 247, ¶ 14, 401 Mont. 405, 414, 473 P.3d 386, 392 (quoting *Benefis Healthcare v. Great Falls Clinic, LLP*, 2006 MT 254, ¶ 14, 334 Mont. 86, 90, 146 P.3d 714, 717). These laws have been "contested" since their passage, with the instant suits filed shortly thereafter. Not a single state-wide election has occurred since HB 176 was passed. Under Montana law, the status quo is thus the same system that preserves Montanans' constitutional rights: EDR.

ARGUMENT

A. Standard of Review

The Secretary utterly ignores the standard she must meet in order for the Court to suspend the preliminary injunction pending appeal. Rule 62(c) of the Montana Rules of Civil Procedure is "based on, and virtually identical in substance to" current Federal Rule of Civil Procedure 62(d). *Pinnacle Gas Res. v. Diamond Cross Props.*, Cause No. DV 07-150, 2008 Mont. Dist. LEXIS 240, *2 (Mont. Dist. Ct. 16th Dist.). And so, district courts consider four factors when deciding whether to suspend an injunction pending appeal—namely: "1. Whether the stay applicant has made a strong showing that he is likely to succeed on the merits. 2. Whether the applicant will be irreparably injured absent a stay. 3. Whether issuance of the stay will substantially injure the other parties interested in the proceeding. 4. Where the public interest lies." *Id.* (citation omitted).; *see also Taylor v. Mont. High Sch. Ass'n*, Cause No. CDV-2015-719, 2015 Mont. Dist. LEXIS 68, *3 (Mont. Dist. Ct. 1st Dist.) (relying on comparison to Fed. R. App. P. 8(a), instead of Fed. R. Civ. P. 62(d), to set the same four factor test). Indeed, "the standard for suspending an injunction pending appeal is essentially the same as the standard for granting the injunction in the first place." *Pinnacle Gas*, 2008 Mont. Dist. LEXIS 240, at *2.

A stay pending appeal is an "extraordinary remedy." *Lohmeier v. Gallatin County*, 2003 ML 2035, ¶ 28; *see also Alaska Central Express, Inc. v. United States*, 51 Fed. Cl. 227, 229 (2001); *Brotherhood of Ry. & S.S. Clerks, Freight Handlers, Express & Station Employees v. Nat'l Mediation Bd.*, 374 F.2d 269, 275 (D.C. Cir. 1966).

The Secretary has not even tried to make the showing that she is entitled to such relief. She is not.

B. The Preliminary Injunction Should Not Be Suspended.[2]

While the Secretary has not tried to meet the four factors relevant to suspending an injunction pending appeal, Plaintiffs have made a clear showing as to each in the briefing on their preliminary injunction.

1. Defendant Has Not Made a Strong Showing That She is Likely to Succeed on the Merits Regarding HB 176.

Defendant did not even attempt to meet her burden of establishing a strong showing that she is likely to succeed on the merits. Indeed she cannot, because Plaintiffs have already demonstrated that they are likely to succeed on the merits of their claims. HB 176 unlawfully burdens Plaintiffs' fundamental rights to vote and equal protection. Strict scrutiny applies when evaluating both claims, because the Montana Supreme Court has consistently held that "strict scrutiny [is] used when a statute implicates a fundamental right found in the Montana Constitution's declaration of rights." *Driscoll*, ¶ 18; *see also State v. Riggs*, 2005 MT 124, ¶ 47, 327 Mont. 196, 206, 113 P.3d 281, 288 ("A right is 'fundamental' under Montana's Constitution if the right . . . is found in the Declaration of Rights."); *Wadsworth v. State* (1996), 275 Mont. 287, 302, 911 P.2d 1165, 1174. It is uncontested that "[t]he right of suffrage is a fundamental right." *Willems v. State*, 2014 MT 82, ¶ 32, 374 Mont. 343, 352, 325 P.3d 1204, 1210; *see also Oberg v. City of Billings* (1983), 207 Mont. 277, 280, 674 P.2d 494, 495 ("Examples of fundamental rights include . . . right to vote"); Mont. Const. art. II, § 13. As such, given that HB 176 implicates Plaintiffs' fundamental rights, strict scrutiny applies under binding Montana

[2] In the interests of brevity and recognizing that the Court just considered these issues in its comprehensive decision on the multiple motions for preliminary injunction in the consolidated cases, Plaintiffs do not retread all of the same ground they covered in their briefing in support of the preliminary injunction and incorporate by reference those filings. *See Western Native Voice* Plaintiffs' Memorandum in Support of Motion for Preliminary Injunction, Dkt. No. 42; *Western Native Voice* Plaintiffs' Reply Memorandum in Support of Motion for Preliminary Injunction, Dkt. No. 98.

Supreme Court precedent. *See Snetsinger v. Mont. Univ. Sys.*, 2004 MT 390, ¶ 17, 325 Mont. 148, 154, 104 P.3d 445, 449–50 (noting that strict scrutiny applies where a law implicates a fundamental right); *Finke v. State ex rel. McGrath*, 2003 MT 48, ¶ 21, 314 Mont. 314, 322, 65 P.3d 576, 581 (applying strict scrutiny to voting restriction).

HB 176 unlawfully "burdens the right to vote" for Native Americans living in rural tribal communities because it "eliminate[es] [an] important voting option[]" for those communities: EDR. *Driscoll v. Stapleton*, Cause No. DV 20-408, slip op. at 23, ¶ 7. Native American voters face numerous barriers to the franchise including rampant poverty, worse educational and health outcomes, less stable housing and higher homelessness rates, long distances to regular access to polling places and post offices, lack of internet or residential mail services, and inadequate transportation. *See, e.g.*, McCool Rep. ¶¶ 18-21, 41-46, 67 & tbls. 32-33, 83-85 (Dkt. No. 45). Native Americans living on reservations also use EDR at a consistently higher rate than other Montanans. Street Aff. ¶ 4 (Dkt. No. 44). Consequently, HB 176 denies a vital service for Native American voters whose right to vote will be severely burdened, if not altogether eliminated, without EDR.

HB 176 also violates Plaintiffs' fundamental right to equal protection. In considering Plaintiffs' equal protection claim, the first step is to "identify the classes involved and determine whether they are similarly situated," as even a facially neutral classification may constitute an equal protection violation "if in reality it constitutes a device designed to impose different burdens on different classes of persons." *Snetsinger*, ¶ 16 (citations and brackets omitted). For purposes of the equal protection analysis, Native American voters and non-Native voters are similarly situated. And as discussed *supra*, HB 176 disproportionately burdens the right to vote of Native American voters in Montana. McCool Rep. ¶¶ 160, 165 (Dkt. No. 45); Street Aff. ¶¶ 4, 6 (Dkt. No. 44).

Any governmental infringement on a fundamental right cannot be justified unless strict scrutiny is satisfied—in other words, the law must be narrowly tailored in service of a compelling government interest. *Mont. Cannabis Indus. Ass'n v. State* ("*MCIA*"), 2012 MT 201, ¶ 16, 366 Mont. 224, 229, 286 P.3d 1161, 1165. Strict scrutiny "is seldom satisfied." *Butte Cmty. Union v. Lewis* (1986), 219 Mont. 426, 431, 712 P.2d 1309, 1312. Whether a compelling state interest exists is a question of law. *State v. Pastos* (1994), 269 Mont. 43, 47, 887 P.2d 199, 202. "[T]o sustain the validity of [an] invasion [upon a fundamental right]" the Secretary "must

also show that the choice of legislative action is the least onerous path that can be taken to achieve the state objective." *Wadsworth*, 275 Mont. at 302, 911 P.2d at 1174 (citation omitted). Such a showing cannot merely be stated, it must be demonstrated and proven via "competent evidence." *Id.* at 303, 1174. The Secretary has not and cannot demonstrate that HB 176 is narrowly tailored to a compelling government interest.

The government interests cited by proponents of HB 176 during the legislative session leading to its adoption have not been proven via competent evidence. Bill sponsor Rep. Greef stated that the legislation would help combat voter fraud; however, when pressed, she was unable to provide any evidence of voter fraud. McCool Rep. ¶¶ 117-118 (Dkt. No. 45). When asked to provide an example of voter fraud, Representative Greef said, "[w]hen I talked about voter fraud I wasn't talking about Montana specifically," and then claimed, without any corroborating evidence, that voter fraud was a national problem. *Id*. ¶ 118. In reality, the data show clearly that voter fraud is infinitesimally small in both Montana and the nation more broadly. *Id.* ¶¶ 105-113. As the Montana Supreme Court made clear in *Driscoll*, the government cannot justify HB 176 under any standard, let alone strict scrutiny, without meaningful "evidence . . . of voter fraud or ballot coercion" for such an interest to be relied upon. *Driscoll*, ¶ 22. "Necessarily, *demonstrating* a compelling interest entails something more than simply saying it is so. . . . Simply because the State alleges a compelling interest, does not obviate the necessity that the State prove the compelling interest by competent evidence." *Wadsworth*, 275 Mont. at 303, 911 P.2d at 1174.

The State's claim that HB 176 will reduce wait times for voters is likewise without merit. The legislative record contained no evidence that eliminating EDR would alleviate long lines at the polls. McCool Rep. ¶ 117 (Dkt. No. 45). In fact, EDR simply could not have contributed to lines at polling places, as the process was only available at county election offices. Wait times to vote in Montana are extremely low, with the vast majority of voters not even having to wait 10 minutes to vote. *See* Street Rebuttal Rep. at 10-13 (Dkt. No. 123). Wait times in Montana are much lower than the national average, and have actually *decreased* in recent years as a greater percentage of Montana voters have relied on absentee voting. *See id.* There is no problem of wait times in Montana, and no evidence that HB 176 would solve such a problem.

Similarly, the State's claim that HB 176 will reduce administrative burdens is unavailing. It is well established that the Secretary's interest in easing administrative burdens on some election

officials cannot outweigh the fundamental right to vote. *See, e.g.*, *Fish v. Kobach*, 840 F.3d 710, 755 (10th Cir. 2016) ("There is no contest between the mass denial of a fundamental constitutional right and the modest administrative burdens to be borne by [the Secretary of State's] office and other state and local offices involved in elections."); *United States v. Georgia*, 892 F. Supp. 2d 1367, 1377 (N.D. Ga. 2012) (finding that administrative, time, and financial burdens on the State are "minor when balanced against the right to vote, a right that is essential to an effective democracy"); *Ga. State Conf. of the NAACP v. Fayette Cnty. Bd. of Comm'rs*, 118 F. Supp. 3d 1338, 1348 (N.D. Ga. 2015) (granting injunction under Section 2 of Voting Rights Act, even though county board of commissioners face administrative burdens from injunction, because "the harm [plaintiffs] would suffer by way of vote dilution outweighs the harm to the [board]"). Further, as Plaintiffs noted in their opposition to Defendant's motion for summary judgment, many election administrators have testified that EDR did not impose significant administrative burdens and that ending EDR might actually make things harder for them. Just last year the State held up EDR as a "helpful provision" and a reason that Montana's election framework is "robust" and "highly convenient" in "offer[ing] electors a versatile set of options to exercise the franchise." Rate Aff. ¶¶ 11, 12; Ex. K, at 4, 19; Ex. L ¶¶ 2, 5, 8 (Dkt. No. 43). The Secretary's predecessor cited EDR as a reason Montana's "voting model empowers voters" and made no mention of concern about fraud or efficiency. Def.'s Br. in Support of Mot. for Summ. J. at 2, *Western Native Voice v. Stapleton*, No. DV 20-0377 (Mont. Dist. Ct. July 30, 2020).

Defendant declined even to make a showing, let alone a strong one, that she is likely to succeed on the merits. Because it is Plaintiffs who are likely to succeed on the merits of their claims challenging HB 176 (as this Court has already recognized), this factor weighs against suspending the preliminary injunction pending appeal.

2. The Secretary Will Not be Irreparably Injured Absent Suspension of the Preliminary Injunction.

The Secretary will suffer no injury if HB 176 remains enjoined, much less an irreparable one. While the Secretary lists money spent and administrative tasks already undertaken, none of these rise to the level or irreparable harm. *Am. Music Co. v. Higbee*, 1998 MT 150, ¶ 15, 289 Mont. 278, 283, 961 P.2d 109, 112 (monetary outlays do not constitute irreparable harm). Indeed, the injunction of HB 176 merely reverts the operation of voter registration in Montana to the way it has functioned for the past 15 years. Having the Secretary and other elections officials

in the state undertake their duties in the way that they had for over a decade in no way constitutes irreparable injury. Moreover, as HB 176 does not actually advance the interests offered by the Secretary, *see supra* Section B.1, enjoining its operation does not injure the Secretary.

As a constitutional officer, Mont. Const. art. VI, § 1, the Secretary cannot be injured by an injunction that is necessary to protect the rights protected by that very same Constitution. Indeed, all branches of the state government are charged with faithfully executing the Constitution, and so Plaintiffs' likelihood of success ensures that there is no injury to any officer of the state in enjoining operation of HB 176. This Court has already rejected the Secretary's arguments that efforts undertaken to implement HB 176 result in injury:

> "Moreover, the Court does not find it persuasive that the Secretary has been taking steps to enact these laws given that is a duty of her job and she has had notice that these laws were contested since before they were signed into law as evidenced in the testimony that occurred in hearings at the legislature and notice soon after they were enacted as evidenced by the Plaintiffs' filing of their complaints. Additionally, Plaintiffs have made this request prior to the holding of the first statewide election since the enactment of these laws."

Findings of Fact, Conclusions of Law, and Order Granting Plaintiffs' Motions for Preliminary Injunctions ("PI Order"), ¶ 92 (Dkt. No. 124).

The Secretary also rehashes her arguments concerning supposed delay, but this Court just determined that "Plaintiffs have not impermissibly delayed in their applications for preliminary injunctions." PI Order ¶ 92. Thus, the timing of the preliminary injunctions does not contribute to any possible harm to the state.

The Secretary has not established irreparable harm absent suspension of the injunction, and so this factor weighs against suspending the preliminary injunction pending appeal.

3. Suspending the Preliminary Injunction Would Substantially Injure Plaintiffs.

This Court has found that "that Plaintiffs have established they will suffer a great or irreparable injury if these laws are not preliminarily enjoined until a case on the merits can be had," PI Order, ¶ 87, and this remains true for a suspension of those same preliminary injunctions. Specifically, the Court determined that Plaintiffs and their members would be irreparably harmed if HB 176 remained in effect during the pendency of the litigation. *Id.* ¶ 89. This is no surprise, as denial of a constitutional right constitutes irreparable harm. *See MCIA*, ¶ 15. And "[b]ecause there can be no 'do-over' or redress of a denial of the right to vote after an

election, denial of that right weighs heavily in determining whether plaintiffs would be irreparably harmed absent an injunction." *Fish*, 840 F.3d at 752; *see also League of Women Voters of N.C. v. North Carolina*, 769 F.3d 224, 247 (4th Cir. 2014) (noting that once an election comes and goes, "there can be no do-over and no redress. The injury to these voters is real and completely irreparable"). "A restriction on the fundamental right to vote therefore constitutes irreparable injury." *Obama for Am. v. Husted*, 697 F.3d 423, 436 (6th Cir. 2012); *see also id*. ("When constitutional rights are threatened or impaired, irreparable injury is presumed.").

The fundamental importance of Plaintiffs' constitutional rights demonstrates that to suspend the injunction in advance of the 2022 statewide elections would substantially injure Plaintiffs, their members, and the communities they serve, and so this factor weighs against suspending the preliminary injunction pending appeal.

4. The Public Interest Is Served by Denial of the Secretary's Motion.

While the Secretary did not attempt to tailor her arguments to the governing standard, Plaintiffs understand the bulk of her argument as though it relates to the public interest. As an initial matter, "it is always in the public interest to prevent the violation of a party's constitutional rights." *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (citation omitted).

The Secretary's claimed concern for voter confusion is perplexing as a factual matter. It is far more likely that voters will be confused by the sudden elimination of EDR, on which they have relied for the past 15 years, rather than voters who became used to its absence during the local elections of 2021. At worst, this latter group will be pleasantly surprised by their ability to rely upon EDR if they so choose. Changes to voting laws do not automatically mean that voters will be confused, and the concern articulated by the U.S. Supreme Court in this context is the risk of the sort of confusion that would provide "incentive to remain away from the polls." *Purcell v. Gonzalez*, 549 U.S. 1, 5 (2006). It is ludicrous to suggest that the law operating in the manner that Montana voters relied upon for over 15 years would cause the sort of confusion that would prevent voters from attempting to vote. This is especially true in the case of EDR, which only makes it easier for Montana voters to access the franchise. The critical factor in the reasoning of *Purcell* included deference to the district court's discretion. *Id.* Here, if anything, this Court deserves the same deference for its detailed factual findings, including those about the timing of upcoming elections and the relative burdens on voters and election administrators.

The Secretary spills the bulk of her ink on activities undertaken by her office. This is not the test for what constitutes the status quo, *see Driscoll*, ¶ 14, nor does it illustrate any voter confusion of any kind. As the Montana Supreme Court has made clear and as this Court just found in granting the preliminary injunctions, the status quo in question is the law as it existed prior to the enactment of the challenged statutes. As a legal matter, the status quo is the "last actual, peaceable, non[-]contested condition which preceded the pending controversy." *Driscoll*, ¶ 14 (quoting *Benefis Healthcare*, ¶ 14). And as this Court found, the Secretary "has had notice that these laws were contested since before they were signed into law as evidenced in the testimony that occurred in hearings at the legislature and notice soon after they were enacted as evidenced by the Plaintiffs' filing of their complaints." PI Order, ¶ 92. Consistently, "Plaintiffs have been clear that the remedy they seek is a return to the status quo that existed prior to the Montana legislature passing HB 176 . . .", *id.* ¶ 5, and the administrative duties undertaken by the Secretary are simply "a duty of her job," *id.* ¶ 92. That the Secretary has undertaken work does not alter the conclusion that the public interest lies in enjoining HB 176. Preventing HB 176 from operating during the upcoming statewide elections is in the clear interest of Montana voters, thousands of whom who have relied upon EDR for over a decade. *See* McCool Rep. ¶ 60 & tbl. 28.

The Secretary's arguments try to elevate administrative concerns over the fundamental rights of all Montanans, thus improperly assessing the public interest or balance of the equities. Of course, all elections require rules under which they are carried out, but mere invocation of purported "administrative burdens" does not outweigh the disenfranchising effects of HB 176. *Cf. Fish v. Kobach*, 189 F. Supp. 3d 1107, 1150 (D. Kan.), *aff'd*, 691 F. App'x 900 (10th Cir.), *aff'd*, 840 F.3d 710 (10th Cir. 2016), *order enforced*, 294 F. Supp. 3d 1154 (D. Kan. 2018). The Secretary's assertion that the preliminary injunction will lead to chaos for the upcoming elections is entirely unavailing. EDR was a common and heavily relied upon feature of Montana's election administration for 15 years. The Secretary and the election administrators can simply conduct voter registration for the 2022 statewide elections under the same rules that operated during the last statewide election. In light of the statewide operation of EDR less than two years ago, the Secretary's alarmism rings hollow.

Additionally, as a factual matter, the Secretary does not cite a single administrative rule required by HB 176, Def. Br. at 9, and her citation to the highly disputed facts, Def. SUF ¶¶ 75,

78-87, provides no further clarity. The citations to the James Declaration therein likewise do not cite a single administrative rule implementing HB 176, and items printed for use polling locations referenced are likewise unrelated as EDR can never take place at a polling location (only at the county elections office). *See* James Decl. ¶¶ 3, 6-16, 53, 72-127. All of the materials related to polling locations are not implicated by HB 176, so the Secretary's invocation of these materials has no relationship to that law. Additionally, the Secretary cites the McLarnon Declaration for the contention that the ElectMT system relies on the operation of HB 176. But nothing in the McLarnon Declaration suggests that either ElectMT or MTVotes requires the continuing operation of HB 176. In fact, it does not cite HB 176 or reference EDR at all. *See generally* McLarnon Decl. Finally, in the deposition of Fergus County Clerk and Recorder just this week, she testified that the new system that the Secretary claims is being mothballed has nothing at all to do with the 2022 elections, and would never have been in effect for the upcoming elections that are impacted by the grant of the preliminary injunction.

Finally, the Secretary's claim that the injunction of HB 176 could cause "disenfranchisement," Def. Br. at 17, is absurd. There is quite literally no way this could be true. To date—across several rounds of preliminary injunction and summary judgment briefing—Defendant has not even attempted to contest Plaintiffs' detailed factual findings that HB 176 will significantly increase voter costs and reduce turnout among Montana voters, especially Native American voters. The injunction of HB 176 ensures that the "ultimate failsafe"[3] of EDR is available for all Montana voters. As Plaintiffs have shown, it is the suspension of this injunction that would lead to any "disenfranchisement."

It is plain that the public interest and the balance of the equities counsel in favor of leaving the preliminary injunction undisturbed as this case proceeds to a final hearing on the merits.

* * *

Defendant's motion falls well short of anything that could justify such an "extraordinary remedy." *Lohmeier*, ¶ 28. While the application of the four-factor test is not a mechanical one

[3] In 2014, when Montana voters affirmed their continued support for EDR, then-Secretary of State described EDR as "the ultimate failsafe." Lisa Baumann, *Ending Election Day Registration Sees Little Support*, Great Falls Trib., (Oct. 19, 2014, 4:17 PM), https://www.greatfallstribune.com/story/news/local/2014/10/19/ending-election-day-registration-sees-little-support/17583087/.

and rests in the discretion of the Court, in this instance, each of the four factors weighs in Plaintiffs' favor, and so the preliminary injunction should remain in place pending appeal.

C. Plaintiffs Do Not Oppose Modification of the Preliminary Injunction with Respect to HB 530.

In their Complaint, Plaintiffs sought relief from the provisions of HB 530 that relate to their ballot assistance efforts—that is, Section 2 of HB 530. *See Western Native Voice* Compl., Prayer for Relief (DV 21-0560, Dkt. No. 1). Thus, WNV Plaintiffs do not have an objection if the Court modifies the preliminary injunction as it relates to HB 530 to enjoin only Section 2 of that enactment. Plaintiffs defer to the other parties in the consolidated actions who have challenged other sections of HB 530 and the discretion of the Court.

CONCLUSION

For the foregoing reasons, the Secretary's motion to suspend the preliminary injunction should be denied.

DATED THIS 14th day of April, 2022.

Respectfully submitted,

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