

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

VIRGINIA COALITION FOR IMMIGRANT RIGHTS; LEAGUE OF WOMEN VOTERS OF VIRGINIA; LEAGUE OF WOMEN VOTERS OF VIRGINIA EDUCATION FUND; AFRICAN COMMUNITIES TOGETHER,

*Plaintiffs,*

v.

SUSAN BEALS, in her official capacity as Virginia Commissioner of Elections; JOHN O'BANNON, in his official capacity as Chairman of the State Board of Elections; ROSALYN R. DANCE, in her official capacity as Vice-Chairman of the State Board of Elections; GEORGIA ALVIS-LONG, in her official capacity as Secretary of the State Board of Elections; DONALD W. MERRICKS and MATTHEW WEINSTEIN, in their official capacities as members of the State Board of Elections; and JASON MIYARES, in his official capacity as Virginia Attorney General,

*Defendants.*

Case No. 1:24-cv-01778  
Judge Patricia Tolliver Giles

**PLAINTIFFS' OPPOSED MOTION  
FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Virginia Coalition for Immigrant Rights, African Communities Together, League of Women Voters of Virginia Education Fund, and League of Women Voters of Virginia hereby move for a preliminary injunction seeking the

following relief:

1. An Order Barring Defendants Beals, O'Bannon, Dance, Alvis-Long, Merricks, Weinstein, and Miyares from violating the National Voter Registration Act of 1993 ("NVRA") by purging registered voters within 90 days of an election and subjecting voters to a discriminatory and non-uniform removal system; and

2. An Order providing injunctive relief to remedy Defendants' violations of the NVRA as described in Plaintiffs' Proposed Order.

Plaintiffs' request for such relief relies upon their Memorandum of Law in support of this motion that is filed contemporaneously herewith, along with Plaintiffs' Proposed Order.

Ezra D. Rosenberg\*  
Ryan Snow\*  
Javon Davis\*  
LAWYERS' COMMITTEE FOR CIVIL RIGHTS  
UNDER LAW  
1500 K Street, NW, Ste. 900  
Washington, DC 20005  
(202) 662-8600  
erosenberg@lawyerscommittee.org  
rsnow@lawyerscommittee.org  
jdavis@lawyerscommittee.org

Orion Danjuma\*  
John Paredes\*  
THE PROTECT DEMOCRACY PROJECT, INC.  
82 Nassau Street, # 601  
New York, NY 10038  
Telephone: (202) 579-4582  
orion.danjuma@protectdemocracy.org  
john.paredes@protectdemocracy.org

/s/ Shanna Ports  
Shanna Ports (VSB No. 86094)  
Danielle Lang\*\*  
Kevin Hancock\*\*  
Brent Ferguson\*\*  
Simone Leeper\*  
CAMPAIGN LEGAL CENTER  
1101 14th Street NW, Suite 400  
Washington, DC 20005  
Tel: (202) 736-2200  
Fax: (202) 736-2222  
sports@campaignlegalcenter.org  
dlang@campaignlegalcenter.org  
khancock@campaignlegalcenter.org  
bferguson@campaignlegalcenter.org  
sleeper@campaignlegalcenter.org

John Powers\*\*  
Hani Mirza\*\*  
ADVANCEMENT PROJECT  
1220 L Street Northwest, Suite 850  
Washington, D.C. 20005  
(202) 728-9557  
jpowers@advancementproject.org  
hmirza@advancementproject.org

Benjamin L. Berwick\*  
THE PROTECT DEMOCRACY PROJECT, INC.  
15 Main Street, Suite 312  
Watertown, MA 02472  
(202) 579-4582  
ben.berwick@protectdemocracy.org

Anna Dorman\*  
THE PROTECT DEMOCRACY PROJECT, INC.  
200 Pennsylvania Ave. NW, Suite # 163  
Washington, DC 20006  
Telephone: (202) 579-4582  
anna.dorman@protectdemocracy.org

*Attorneys for Plaintiffs Virginia Coalition for  
Immigrant Rights, the League of Women Voters  
of Virginia, the League of Women Voters of  
Virginia Education Fund, and African  
Communities Together*

*\*Motion for pro hac vice participation  
forthcoming.*

*\*\*Motion for pro hac vice participation  
pending.*

**CERTIFICATE OF SERVICE**

I certify that on October 15, 2024, I electronically filed the above document with the Clerk of Court using the ECF system, which will provide electronic copies to any counsel of record. Plaintiffs' Counsel will also send courtesy copies to attorneys at the Virginia Attorney General's Office who have met with Plaintiffs' counsel regarding this matter.

/s/ Shanna Ports  
Shanna Ports