

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

FILED
U.S. DISTRICT COURT
INDIANAPOLIS DIVISION
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SOUTHERN DISTRICT
OF INDIANA
LAURA A. BRIGGS
CLERK

DRAMETRA BROWN, for herself and)
on behalf of other similarly situated,)
)
Plaintiff,)
)
v.)
)
TODD ROKITA, in his Official)
Capacity as Indiana Secretary of)
State; J. BRADLEY KING AND KRISTI)
ROBERTSON, each in their official)
capacities as co-directors of the Indiana)
Elections Division; MARION COUNTY)
BOARD OF VOTER REGISTRATION;)
MARION COUNTY BOARD OF)
ELECTIONS;)
)
Defendant.)

Cause No.

COMPLAINT—CLASS ACTION

1 : 08 -cv- 1484 RLY -TAB

**PLAINTIFFS' APPLICATION FOR
TEMPORARY RESTRAINING ORDER AND DECLARATORY RELIEF**

Pursuant to Rule 65(b), Fed. R. Civ. P., and for the reasons set forth in the memorandum submitted herewith, plaintiffs respectfully move the Court for a temporary restraining order (1) enjoining Defendants from denying Plaintiffs right to vote solely on the basis that they used an older voter registration form (which elicited the same information as the current form) and (2) requiring Defendants to provide a list of those voters whose registrations were denied *solely* upon the grounds that they used an old registration form to be distributed to every polling place with instructions to poll workers to allow such voters to cast a regular ballot if they meet all other qualifications to vote. Further, plaintiffs respectfully move the court for a temporary restraining order requiring Defendants to comply with federal laws that prohibit states from predicating the fundamental right to vote on (1) supplying more information on voter registration applications

than is required to determine voter qualifications and administer elections or (2) the provision of specifically and expressly duplicative information.

Respectfully submitted,



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