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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

RECLAIM IDAHO, an Idaho Political
Action Committee, and **LUKE
MAYVILLE**,

Plaintiff,

v.

LAWRENCE DENNEY, in his official
capacity as Idaho Secretary of State;
BRADLEY LITTLE, in his official
capacity as Governor of Idaho

Defendants.

Case No. 1:20-cv-00268-BLW

**EXPEDITED MOTION TO
ENFORCE COURT'S
ORDER**

On June 23, 2020, to remedy the violation of Plaintiffs' constitutional rights, this Court ordered Defendants to choose either to certify the signatures that have been collected and place Reclaim Idaho's initiative on the November 2020 ballot for voter consideration, or to allow Reclaim Idaho an additional 48-days to gather signatures through online solicitation and submission. The Court gave Defendants until 5:00 p.m. on June 26 to make their election.

On June 26, the Court issued a written decision memorializing its ruling from the bench. (Dkt. 14.)

In Defendants' "Notice and Motion to Stay Pursuant to F.R.C.P. 62(d) AND F.R.A.P. 8," filed on June 26, they provided notice that they did not intend to comply with the Court's order to choose either option. (Dkt. 16.) Today, the Court issued an order denying Defendants' Motion to Stay. (Dkt. 17.)

Defendants have made it clear that they do not intend to comply with either option that the Court ordered them to choose. In light of their extraordinary response, Reclaim Idaho requests that the Court order Defendants to certify the initiative for the November ballot. The other option would require a "process and protocol" to complete the requested 48-days of online gathering of signatures. (Dkt. 17, pp. 3-4) Defendants' clear response shows that they have no intention of cooperating with Reclaim Idaho or complying with the Court's order. For that reason, Reclaim Idaho respectfully requests that the Court order Defendants to certify the initiative for the November 2020 ballot. Defendants have already indicated that they will seek Ninth Circuit review and such an order would put a definitive remedy before the appellate court. Further, certification for the ballot is not as time-sensitive as the online gathering of signatures would be.

Respectfully submitted on this 29th day of June 2020.

/s/Deborah A. Ferguson

Craig H. Durham

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify on this 29th day of June, 2020, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing

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