

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DAN PROFT, et al.,	)	
	)	
	)	Case No. 18 CV 4947
	)	
v.	)	
	)	Hon. Virginia M. Kendall
LISA MADIGAN, et al.,	)	
	)	
	)	
	)	
Defendants.	)	
	)	

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs Dan Proft and Liberty Principles PAC move under Fed. R. Civ. P. 65(a) for a preliminary injunction barring Defendants from enforcing the Illinois Election Code's prohibition of coordinated expenditures by independent expenditure committees in electoral races in which the Code's contribution limits that apply to all other individuals and organizations have been eliminated pursuant to 10 ILCS 5/9-9.5(h) or (h-5).

Plaintiffs respectfully request that the Court grant this motion for all the reasons stated in the memorandum of law they are filing contemporaneously with this motion.

Dated: August 9, 2018

Respectfully Submitted,

/s/ Patrick Hughes

Patrick J. Hughes (#6225212)

Jeffrey M. Schwab (#6290710)

James J. McQuaid (#6321108)

LIBERTY JUSTICE CENTER

190 South LaSalle Street, Suite 1500

Chicago, Illinois 60603

Telephone (312) 263-7668

Facsimile (312) 263-7702

phughes@libertyjusticecenter.org

jschwab@libertyjusticecenter.org

jmcquaid@libertyjusticecenter.org

*Attorneys for Plaintiff\*

**CERTIFICATE OF SERVICE**

I, James J. McQuaid, an attorney, certify that on August 9, 2018, I served Plaintiffs' Motion for Preliminary Injunction on Defendants' counsel by filing it through the Court's electronic case filing system.

/s/ James J. McQuaid