

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

Daniel R. Suhr (WI No. 1056658)*
Brian K. Kelsey (TN No. 022874)*
Liberty Justice Center
190 S. LaSalle Street, Suite 1500
Chicago, Illinois 60603
Ph.: 312/263-7668
Email: bkelsey@libertyjusticecenter.org
dsuhr@libertyjusticecenter.org
Lead Counsel for Plaintiff
*Motion *pro hac vice* pending

Mark R. Scirocco/061192013
LAW OFFICES OF ROBERT A. SCIROCCO, P.C.
98 Route 46, Suite 6
Budd Lake, NJ 07828
(973) 691-1188
Fax: (973) 691-3353
Email: Mark@sciroccoesq.com

Local counsel for Plaintiff

**ILLINOIS OPPORTUNITY
PROJECT,**

Plaintiff,

v.

**STEPHEN M. HOLDEN, ERIC H.
JASO, and MARGUERITE T.
SIMON,** in their official capacities as
commissioners of the New Jersey
Election Law Enforcement
Commission,

Defendants.

Case No. 1:19-cv-17912

**NOTICE OF MOTION BY
PLAINTIFF FOR PRELIMINARY
INJUNCTION**

MOTION DAY: OCTOBER 7, 2019

PLEASE TAKE NOTICE that on October 7, 2019, or as soon thereafter as counsel may be heard, Plaintiff Illinois Opportunity Project (“Plaintiff”), by and through its undersigned counsel, will move this Court to enter a preliminary injunction against Defendant Commissioners Holden, Jaso, and Simon, as follows:

- a. Enjoin the Commissioners from enforcing the registration requirement in C.19:44A-8.1(21)(a)(1-3) against IOP and other organizations that engage solely in issue advocacy; and
- b. Enjoin the Commissioners from enforcing the sponsorship disclosure requirements in C. 19:44A-8.1(21)(a) against IOP and other organizations when they sponsor issue advocacy; and
- c. Enjoin the Commissioners from categorizing IOP and other organizations that engage solely in issue advocacy as “independent expenditure committees” under C. 19:44A-3(t).

PLEASE TAKE FURTHER NOTICE that Plaintiff shall rely upon the accompanying memorandum of law and supporting documentation.

PLEASE TAKE FURTHER NOTICE that a proposed Order accompanies this motion.

Dated: September 12, 2019

Daniel R. Suhr (WI No. 1056658)*
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Chicago, Illinois 60603
Ph.: 312/263-7668
Email: dsuhr@libertyjusticecenter.org
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Lead Counsel for Plaintiff

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Respectfully Submitted,

/s/ Mark R. Scirocco

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