

UNITED STATES DISTRICT COURT  
DISTRICT OF COLORADO

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COMMON CAUSE OF COLORADO, on behalf of itself	:
and its members; MI FAMILIA VOTA EDUCATION	:
FUND; and SERVICE EMPLOYEES INTERNATIONAL	:
UNION, on behalf of itself and its members,	:
	:
Plaintiffs,	:
	:
vs.	:
	:
MICHAEL COFFMAN, in his official capacity as	:
Secretary of State for the State of Colorado,	:
	:
Defendant.	:
-----X	

Civil No. \_\_\_\_\_

**[PROPOSED] TEMPORARY RESTRAINING ORDER AND  
ORDER TO SHOW CAUSE FOR A PRELIMINARY INJUNCTION**

WHEREAS the Court has considered the Complaint, the Motion for Temporary Restraining Order, and the accompanying Memorandum of Law, Exhibits, and Declarations filed by Plaintiffs Common Cause of Colorado, Mi Familia Vota Education Fund, and Service Employees International Union; and

WHEREAS the Court finds that Plaintiffs will suffer irreparable harm in the absence of immediate action by the Court, that Plaintiffs are likely to succeed on the merits of the Complaint, that the balance of hardships favors the Plaintiffs, and that the public interest weighs in favor of an order;

IT IS HEREBY ORDERED that the Defendant is temporarily enjoined and restrained from removing or cancelling the names of any voters from the official list of

eligible voters for any reason not provided for in 42 U.S.C. § 1973gg-6(c)(2)(B) pending a disposition on Plaintiff's motion for a preliminary injunction;

IT IS FURTHER ORDERED that the Defendant is temporarily enjoined and restrained from removing or cancelling the names of any voters from the official list of eligible voters in violation of 42 U.S.C. § 1973gg-6(d) pending a disposition on Plaintiff's motion for a preliminary injunction; and

IT IS FURTHER ORDERED that the Defendant show cause before the Honorable \_\_\_\_\_, United States District Judge, at Courtroom \_\_\_\_, in the United States Courthouse located at 901 19th Street, Denver, Colorado on Monday, October 27, 2008 at \_\_\_\_ \_\_.m. or as soon thereafter as counsel can be heard, why a preliminary injunction should not issue pursuant to Rule 65(b) of the Federal Rules of Civil Procedure granting the following relief pending a trial on the merits:

a. enjoining and restraining Defendant from removing or cancelling the names of any voters from the official list of eligible voters for any reason not provided for in 42 U.S.C. § 1973gg-6(c)(2)(B);

b. enjoining and restraining Defendant from removing or cancelling the names of any voters from the official list of eligible voters in violation of 42 U.S.C. § 1973gg-6(d);

c. requiring Defendant to reinstate the names of any and all voters who were removed or cancelled from the official list of eligible voters since May 13, 2008 for any reason not provided for in 42 U.S.C. § 1973gg-6(c)(2)(B); and

d. requiring Defendant to reinstate the names of any and all voters who were removed or cancelled from the official list of eligible voters in violation of 42 U.S.C. § 1973gg-6(d).

Dated: Denver, Colorado  
October \_\_, 2008

Issued: \_\_\_\_\_ .m.

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United States District Judge