IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case No. 5:22-CV-276-D-BM

NORTH CAROLINA GREEN PARTY, ANTHONY NDEGE, MICHAEL TRUDEAU, MATTHEW HOH, SAMANTHA WORRELL, SAMANTHA SPENCE, K. RYAN PARKER and AARON MOHAMMED, Plaintiffs, v. NORTH CAROLINA STATE BOARD OF ELECTIONS and DAMON CIRCOSTA, STELLA ANDERSON, JEFF CARMON, STACY EGGERS IV, TOMMY TUCKER, and KAREN BRINSON BELL, in their official capacities as members or employees of the North Carolina State Board of Elections, Defendants.	**PLAINTIFFS' EMERGENCY MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs North Carolina Green Party ("NCGP"), Anthony Ndege, Michael Trudeau, Matthew Hoh, Samantha Worrell, Samantha Spence, K. Ryan Parker and Aaron Mohammed (collectively, "Plaintiffs") respectfully move the Court to enter a preliminary injunction that directs Defendants North Carolina State Board of Elections, Damon Circosta, Stella Anderson, Jeff Carmon, Stacy Eggers IV, Tommy Tucker and Karen Brinson Bell (collectively, "Defendants") to certify the petitions filed by NCGP as sufficient to qualify NCGP as a new political party in North Carolina's November 8, 2022 general election under N.C. GEN. STAT. § 163-96(a)(2).[1] Plaintiffs further request that the Court enjoin Defendants from enforcing § 163-98 against Plaintiffs, insofar as that provision requires a new party to certify

[1] Hereinafter, all statutory citations are to the General Statutes of North Carolina unless otherwise indicated.

its candidates and the candidates to file a notice of candidacy and application to change party affiliation, or take any other action, on or before July 1, 2022. Finally, Plaintiffs request that the Court direct Defendants to take any and all action necessary to ensure the inclusion of Plaintiff NGCP's duly nominated candidates, including Plaintiff Hoh and Plaintiff Trudeau, on North Carolina's November 8, 2022 general election ballot.

In support of this Motion, Plaintiffs respectfully submit the accompanying Memorandum of Law, as well as the following: Declaration of Anthony Ndege (Exhibit 1); Declaration of Michael Trudeau (Exhibit 2); Declaration of Matthew Hoh (Exhibit 3); Declaration of Rose Ellen Seeman (Exhibit 4); Declaration of Clinton Ebadi (Exhibit 5); Declaration of Jeremy Gilchrist (Exhibit 6); Declaration of Charlie Hammerle (Exhibit 7); Declaration of Connor Harney (Exhibit 8); Declaration of Andrew Hicks (Exhibit 9); Declaration of Brian Irving (Exhibit 10); Declaration of Aaron Mohammed (Exhibit 11); Declaration of Janet Nagel (Exhibit 12); Declaration of K. Ryan Parker (Exhibit 13); Declaration of Ahmed Selim (Exhibit 14); Declaration of Samantha Spence (Exhibit 15); Declaration of Samanth Worrell (Exhibit 16); and Declaration of Scott Satalino (Exhibit 17).

Dated: July 21, 2022

Respectfully submitted,

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**Local Civil Rule 83.1(d) Counsel*

CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2022 the foregoing document was filed using the Court's CM/ECF system, which will effect service upon all counsel of record.

/s/Oliver B. Hall
Oliver B. Hall

Counsel for Plaintiffs