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18 *\*Application for admission pro hac vice  
19 pending/forthcoming*

20 Attorneys for Plaintiffs

21 UNITED STATES DISTRICT COURT  
22 EASTERN DISTRICT OF CALIFORNIA  
23 SACRAMENTO DIVISION

24 JERRY GRIFFIN, MICHELLE BOLOTIN,  
25 MICHAEL SIENKIEWICZ, AND JAMES  
26 B. OERDING,

27 Plaintiffs,

28 v.

ALEX PADILLA, in his official capacity as  
Secretary of State of California,

Defendant.

Case No. 2:19-cv-01477-MCE-DB

**NOTICE OF MOTION AND MOTION  
FOR PRELIMINARY INJUNCTION**

Hearing Date: September 19, 2019

Hearing Time: 2:00 p.m.

Courtroom: 7, 14th Floor

Judge: Hon. Morrison C. England, Jr.

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**NOTICE**

Notice is hereby given that Plaintiffs JERRY GRIFFIN, MICHELLE BOLOTIN, MICHAEL SIENKIEWICZ, and JAMES B. OERDING make the following motion, to be heard on September 19, 2019 at 2:00 p.m., 501 I Street, Sacramento, Courtroom 7.

**MOTION**

Pursuant to Local Rule 231(d) and Fed. R. Civ. P. 65, Plaintiffs hereby move to enjoin the enforcement of SB 27, requiring presidential candidates to disclose their tax returns as a precondition to appearing on the primary ballot. *See* Cal. Elec. Code §§ 6880-6884.

This motion is based on the accompanying memorandum of law, declarations of Jerry Griffin, Michelle Bolotin, Michael Sienkiewicz, and James B. Oerding, and the pleadings on file. Plaintiffs do not desire to present oral testimony at the hearing and estimate the hearing will require one hour. *See* Local Rule 231(d)(3).

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Dated: August 20, 2019

Respectfully submitted,

JUDICIAL WATCH, INC.

By: /s/ Robert Patrick Sticht.  
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