## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF IOWA CENTRAL DIVISION

LAURA BELIN,	
Plaintiff,	
v.  MEGHAN NELSON, in her official capacity as Chief Clerk of the Iowa House of Representatives,	Case No
Defendant.	

## PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

To all parties and their counsel of record:

Please take notice that, as soon as the matter may be heard, Plaintiff Laura
Belin will and hereby moves the Court under Rule 65 of the Federal Rules of Civil
Procedure and Local Rule 65, for a temporary restraining order and for a
preliminary injunction prohibiting Defendant Meghan Nelson and her officers,
agents, divisions, commissions, and all persons acting under or in concert with her,
from enforcing her unconstitutional press credential policy against Belin,
withholding press credentials from journalists on account of their being
"nontraditional" or "independent," and, further, enjoining Nelson from denying
Belin access to the press work space on the Iowa House floor for the 2024 legislative
session.

The grounds for this motion are set forth in the accompanying Brief, and declarations and exhibits in support which are being filed together with this motion and are expressly incorporated by reference herein.

## Respectfully submitted.

Charles Miller\*
Ohio Bar No. 0073844
Courtney Corbello\*
Trial Counsel
Texas Bar No. 24097533
INSTITUTE FOR FREE SPEECH
1150 Connecticut Ave., NW
Suite 801
Washington, D.C. 20036
Tel: (202) 985-1644
Fax: (202) 301-3399

cmiller@ifs.org ccorbello@ifs.org

Counsel for Laura Belin
\*pro hac vice admission being sought

Dated: January 19, 2024

/s/ Jack Bjornstad
Jack Bjornstad
Iowa Bar No. 16147
JACK BJORNSTAD LAW OFFICE
1700 Hill Avenue
Spirit Lake, Iowa 51360
Tel: 712-332-5225
jack@bjornstad.law