

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

MINNESOTA RIGHT TO LIFE and
MINNESOTA GUN RIGHTS,

Plaintiffs,

v.

FARIS RASHID, in his official
capacity as Chair of the Minnesota
Campaign Finance and Public
Disclosure Board,

Defendants.

Case No: 25-cv-02476-JWB-DTS

Judge: Jerry W. Blackwell

**MOTION FOR AN
EX PARTE TEMPORARY
RESTRAINING ORDER
AND EMERGENCY
PRELIMINARY
INJUNCTION**

***EXPEDITED HANDLING
REQUESTED***

Pursuant to Fed. R. Civ. P. 65 and Local Rule 7.1(d), Plaintiffs Minnesota Right to Life and Minnesota Gun Rights move for emergency injunctive relief preventing Defendants from enforcing Minnesota's unconstitutional disclosure laws for grassroots advocacy.

Plaintiffs move for an *ex parte* temporary restraining order, followed by an emergency preliminary injunction to be handled on an expedited basis, that enjoins Defendants from enforcing the requirement in Minn. Stat. § 10A.04 subd. 6(d) that compels Defendants to disclose the identity and address of vendors paid more than \$2,000 for advertising used for the purpose of urging members of the public to contact public or local officials to influence official actions.

Plaintiffs request an *ex parte* temporary restraining order to immediately prevent Defendants from enforcing Minn. Stat. § 10A.04 subd. 6(d), followed by expedited handling of Plaintiffs' motion for a preliminary injunction under Local Rule 7.1(d)(4)(A). This motion is based on the memorandum of law, declaration, and exhibits filed contemporaneously with the motion.

Dated: June 13, 2025

Respectfully submitted,

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**pro hac motion pending*

Counsel for Plaintiffs

FED. R. CIV. P. 65(B)(1)(B) CERTIFICATE

Because of the need for immediate relief, Plaintiffs are filing this motion contemporaneously with their complaint before Defendants have been served or any counsel representing Defendants have entered an appearance. I certify that I emailed notice of Plaintiffs' intent to file this motion to the Minnesota Campaign Finance and Public Disclosure Board, Minnesota Attorney General's Office, and the Dakota County Attorney's Office. After filing this

motion, I will email copies of the motion and supporting documents, as well as all other documents filed in the case, to the same. I will also arrange for service of all papers on the Minnesota Attorney General's office, the Ramsey County Attorney's Office, the Hennepin County Attorney's Office, the Dakota County Attorney's Office, and the named defendants at the Campaign Finance and Public Disclosure Board.

An *ex parte* temporary restraining order is necessary to prevent Defendants from causing irreparable harm to Plaintiffs' First Amendment rights by enforcing the challenged disclosure rule until the Court can resolve Plaintiffs' motion for a preliminary injunction.

/s/ Brett R. Nolan*
**pro hac motion pending*