

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

DYLAN BRANDT, et al.,

PLAINTIFFS

v.

Case No. 4:21-CV-00450-JM

LESLIE RUTLEDGE, et al.,

DEFENDANTS

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs hereby move the Court to enter a preliminary injunction that restrains Defendants and successors in office from enforcing any provision of House Bill 1570, Act 626 of the 93rd General Assembly of Arkansas, to be codified at ARK. CODE ANN. §§ 20-9-1501 to 20-9-1504 and 23-79-164, during the pendency of this litigation.

In support of this Motion, Plaintiffs submit the following:

- Exhibit 1 - Declaration of Dylan Brandt in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 2 - Declaration of Joanna Brandt in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 3 - Declaration of Sabrina Jennen in Support of Plaintiffs' Motion for a Preliminary Injunction;

- Exhibit 4 - Declaration of Aaron and Lacey Jennen in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 5 - Declaration of Brooke Dennis in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 6 - Declaration of Shayne and Amanda Dennis in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 7 - Declaration of Parker Saxton in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 8 - Declaration of Donnie Saxton in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 9 - Declaration of Dr. Michele Hutchison in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 10 - Declaration of Dr. Kathryn Stambough in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 11 - Declaration of Dr. Deanna Adkins in Support of Plaintiffs' Motion for a Preliminary Injunction;
- Exhibit 12 - Declaration of Dr. Armand H. Matheny Antommara in Support of Plaintiffs' Motion for a Preliminary Injunction; and
- Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction.

Plaintiffs' Memorandum of Law in Support of the Motion demonstrates that Plaintiffs are likely to prevail on the merits of their claims, a preliminary injunction is necessary to prevent irreparable harm to Plaintiffs, and such a preliminary injunction is in the public interest.

Dated: June 15, 2021

Respectfully submitted,

/s/ Leslie Cooper

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