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Attorneys for Plaintiffs

FOURTH JUDICIAL DISTRICT, STATE OF IDAHO
ADA COUNTY

**Idaho Democratic Party, Brady Harrison,
and Derek Farr,**

Plaintiffs,

vs.

**Lawrence Denney in his capacity as the
Idaho Secretary of State, and Kanye West,**

Defendants.

Case No. CV01-20-14470

**Application for Temporary Restraining
Order**

Idaho R. Civ. P. 65(b)

Expedited Hearing Requested

Pursuant to Idaho R. Civ. P. 65(b) Plaintiffs request that this Court issue a temporary
restraining order against Defendants as follows:

1. Directing him to instruct the county clerks to not issue any ballots for the November 3, 2020 general election that include Kanye West and Michelle Tidball as independent candidates for president and vice-president; and
2. Directing him to withdraw his previous certification of West and Tidball as independent candidates.

The basis for this application is that, based on the specific facts in the Verified Complaint filed in this case, Defendant Kanye West is ineligible to appear on the ballot for the general election as an independent candidate for president because he is affiliated with the Republican Party through his voter registration in Wyoming; the Secretary of State has admitted Defendant West is ineligible to appear on the ballot; the Secretary of State has declined to stop the printing and mailing of ballots with Defendant West's name on them to voters; some counties may be printing and about to mail absentee ballots to voters; and if ballots with an acknowledged ineligible candidate are mailed and not restrained from being mailed irreparable harm will occur.

Plaintiffs request this Court enter the temporary restraining order effective until such time as all parties have been notified and can be heard. Counsel for Plaintiffs are attempting to notify Defendants of the Complaint and this Application and are requesting an expedited hearing on this application.

Dated September 11, 2020

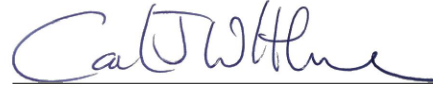
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Dated September 11, 2020

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A handwritten signature in blue ink, appearing to read "Carl J. Withroe", written over a horizontal line.

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