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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

TYLER BOWYER, MICHAEL JOHN BURKE,
NANCY COTTLE, JAKE HOFFMAN,
ANTHONY KERN, CHRISTOPHER M. KING,
JAMES R. LAMON, SAM MOORHEAD,
ROBERT MONTGOMERY, LORAINÉ
PELLEGRINO, GREG SAFSTEN,
SALVATORE LUKE SCARMARDO, KELLI
WARD, and MICHAEL WARD;

Plaintiffs,

v.

DOUG DUCEY, in his official capacity as
Governor of the State of Arizona, and KATIE
HOBBS, in her official capacity as the Arizona
Secretary of State;

Defendants.

Case No.

**PROPOSED ORDER
GRANTING EMERGENCY
INJUNCTION RELIEF**

THE COURT has before it Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction filed December 2, 2020, seeking:

1. An order directing Governor Ducey and Secretary Hobbs to de-certify the election results;
2. An order enjoining Governor Ducey from transmitting the currently certified election results the Electoral College;
3. An immediate emergency order to seize and impound all servers, software, voting machines, tabulators, printers, portable media, logs,

1 ballot applications, ballot return envelopes, ballot images, paper ballots,
2 and all election materials related to the November 3, 2020 Arizona
3 election for forensic audit and inspection by the Plaintiffs;

- 4 4. An order that no votes received or tabulated by machines that were not
5 certified as required by federal and state law be counted;
- 6
- 7 5. A declaratory judgment declaring that Arizona's failed system of
8 signature verification violates the Electors and Elections Clause by
9 working a de facto abolition of the signature verification requirement;
- 10
- 11 6. A declaratory judgment declaring that currently certified election results
12 violate the Due Process Clause, U.S. CONST. Amend. XIV;
- 13
- 14 7. A declaratory judgment declaring absentee ballot fraud occurred in
15 violation of Constitutional rights, Election laws and under state law;
- 16
- 17 8. A permanent injunction prohibiting the Governor and Secretary of State
18 from transmitting the currently certified results to the Electoral College
19 based on the overwhelming evidence of election tampering;
- 20
- 21 9. Immediate production of 48 hours of security camera recording of all
22 rooms used in Maricopa County for November 3, 2020 and November
23 4, 2020.
- 24
- 25 10. Plaintiffs further request the Court grant such other relief as is just and
26 proper, including but not limited to, the costs of this action and their
27 reasonable attorney fees and expenses pursuant to 42 U.S.C. 1988.
- 28

The Court has reviewed the terms and conditions of this Emergency Injunctive
Relief Order, and for good cause shown IT IS HEREBY ORDERED THAT:

