

**United States District Court  
District of Minnesota**

<b>Minnesota Citizens Concerned For Life, Inc.</b> et al.,  <i>Plaintiff,</i>  v.  <b>Lori Swanson et al.,</b>  <i>Defendants.</i>	<b>Civ. No. 10-CV-2938 DWF/JSM</b>  <b>ORAL ARGUMENT REQUESTED</b>  Estimated Time Needed: 1 Hour
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**Motion for Preliminary Injunction**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Minnesota Citizens Concerned for Life, Inc., The Taxpayers League of Minnesota, and Coastal Travel Enterprises, LLC (“the Corporations”) respectfully moves for a preliminary injunction to enjoin the enforcement of:

- a. **Minnesota Statutes sections 10A.12(1), 10A.12(1a), 211B.15(3)**, which ban corporate general-fund independent expenditures;
- b. **Minnesota Statutes sections 10A.12(1), 10A.27(13), 211B.15(2)**, which ban corporate general-fund contributions to independent expenditure committees;
- c. **Minnesota Statutes sections 211B.15(2), (3) and (4)**, which ban corporate contributions and expenditures that are judged by the State as designed to “promote or defeat” a candidate or candidates;
- d. **Minnesota Statutes section 10A.01(18)**, as authoritatively interpreted by the

Minnesota Campaign Finance and Public Disclosure Board, which defines “express advocacy” (and, so also, “independent expenditure”) in vague and overbroad terms; and

e. **Minnesota Statutes sections 10A.27(13), 211B.15(2), 211B.15(4)**, which ban corporate contributions to candidates and political parties.

This motion is made on the grounds specified in this motion, Plaintiffs’ memorandum in support thereof, the Verified Complaint, and such other and further evidence as may be presented to the Court at the time of the hearing.

July 8, 2010

Respectfully submitted,

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\*Pro hac vice application to be filed  
when docket number is available.

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