

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

ELECTRONIC PRIVACY INFORMATION CENTER

Plaintiff,

v.

PRESIDENTIAL ADVISORY COMMISSION ON
ELECTION INTEGRITY; MICHAEL PENCE, in his
official capacity as Vice Chair of the Presidential Advisory
Commission on Election Integrity; KRIS KOBACH, in his
official capacity as Vice Chair of the Presidential Advisory
Commission on Election Integrity; EXECUTIVE OFFICE
OF THE PRESIDENT OF THE UNITED STATES;
OFFICE OF THE VICE PRESIDENT OF THE UNITED
STATES; GENERAL SERVICES ADMINISTRATION

Defendants.

Civil Action No. _____

[PROPOSED] TEMPORARY RESTRAINING ORDER

Upon consideration of Plaintiff's Emergency Motion for a Temporary Restraining Order prohibiting Defendants from collecting voter roll data from state election officials prior to the completion and public release of a Privacy Impact Assessment, as required by federal law, E-Government Act of 2002, Pub. L. 107-347, 116 Stat. 2899 (codified as amended at 44 U.S.C. § 3501 note);

It appearing to the Court that Plaintiff is likely to succeed on the merits of its action, that it will suffer irreparable injury if the requested relief is not issued, that Defendants will not be harmed if the requested relief is issued, and that the public interest favors the entry of such an order, it is, therefore,

ORDERED that Plaintiff's application for a Temporary Restraining Order is hereby GRANTED;

ORDERED that Defendants immediately halt collection of voter roll data from state election officials;

ORDERED that Defendants immediately delete and disgorge any voter roll data already collected or hereafter received;

ORDERED, in accordance with Fed. R. Civ. P. 65(c) and *NRDC v. Morton*, 337 F. Supp. 167, 169 (D.D.C. 1971), *aff'd on other grounds*, 458 F.2d 827 (D.C. Cir. 1972) (bonds for injunctive relief may be reduced when plaintiff initiates a public interest litigation), that this injunction shall be effective upon Plaintiff's giving of security in the amount of \$10 by depositing that amount with the Clerk of Court; and

ORDERED, in accordance with Fed. R. Civ. P. 65(b), that this temporary restraining order shall expire ten days after its entry upon the docket, unless extended for good cause shown.

Date: _____

Time: _____

United States District Judge