

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION**

)	
CENTER FOR INDIVIDUAL FREEDOM,)	
)	
Plaintiff,)	
v.)	
)	Case No. 13-2715
CHARLES R. SCOTT, District Attorney, 1 st)	
Judicial District, <i>et al.</i> ;)	Judge: _____
)	
Defendants.)	
)	

EMERGENCY MOTION FOR A PRELIMINARY INJUNCTION

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Center for Individual Freedom (“CFIF”), that respectfully moves this Court to issue a preliminary injunction enjoining Defendants from enforcing Louisiana Revised Statute 18:1483 Campaign Finance Disclosure Act beyond the narrow and precise construction given to it in *Center for Individual Freedom v. Carmouche*, 449 F.3d 655 (5th Cir. 2006), as the only way to cure the unconstitutional vagueness of the statutory language.

The requested relief is necessary to permit CFIF to engage in protected speech in advance of the upcoming October 19, 2013 election, and CFIF respectfully asks the Court to issue a decision by October 9, 2013. As the accompanying memorandum and declaration demonstrate, CFIF is likely to prevail on the merits, the requested injunction is necessary to protect CFIF from irreparable injury to its First Amendment rights, and the balance of equities strongly favors preliminary relief. CFIF has provided notice of this motion and a copy of the complaint and

motion papers to Ms. Kathleen Allen, General Counsel for the Louisiana Board of Ethics, and to Defendant Charles R. Scott.

WHEREFORE, Plaintiff, Center for Individual Freedom, prays that after due proceedings are had, this Honorable Court grant its Emergency Motion for a Preliminary Injunction, and issue a preliminary injunction enjoining Defendants Charles R. Scott, M. Blake Monroe, Scott Schneider, Terry Backhaus, Julie E. Blewer, Charles Emile “Peppi” Bruneau, Jr., Jean Ingrassia, Dr. Louis Leggio, Dr. Steve Lemke, Bob McAnelly, Ashley Kennedy Shelton, and Grove Stafford from enforcing Louisiana Revised Statute 18:1483 Campaign Finance Disclosure Act beyond the meaning given to it in *Center for Individual Freedom v. Carmouche*, 449 F.3d 655 (5th Cir. 2006), as well as all other relief to which Plaintiff may be entitled.

Respectfully Submitted,

PHELPS DUNBAR, L.L.P.

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ATTORNEYS FOR PLAINTIFF, CENTER
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Emergency Motion for a Preliminary Injunction has been served upon the following by United States mail, facsimile, and electronically on September 20, 2013:

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