

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
FLORIDA**

Tallahassee Division

NEW FLORIDA MAJORITY
EDUCATION FUND, COMMON CAUSE
and MI FAMILIA VOTA EDUCATION
FUND,

Plaintiffs,

Civil Action No. 4:18-cv-00466
MW-CAS

v.

KEN DETZNER, in his official
capacity as Secretary of State of the
State of Florida,

Defendant.

**AMENDED REQUEST FOR EMERGENCY INJUNCTIVE RELIEF
IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs, by and through counsel, hereby submit this amended request for emergency injunctive relief and, in support thereof, state as follows:

1. On October 10, 2018, Plaintiffs filed a complaint against Secretary of State Ken Detzner seeking an extension of the voter registration deadline from October 9, 2018, to October 16, 2018, in light of Hurricane Michael and Governor Rick Scott's state of emergency issued as to 35 counties expected to be impacted by the storm. [D.E. 1]. Plaintiffs also filed a motion for a temporary restraining order and accompanying memorandum of law in support of the motion requesting the same relief. [D.E. 3].

2. Hurricane Michael made landfall in Florida the afternoon of October 10, 2018. It is reported that the entire Panhandle in Florida was affected.¹ It is estimated that 375,000 people

¹ <https://www.cbsnews.com/live-news/hurricane-michael-path-evacuation-florida-storm-surge-weather-forecast-today-2018-live-updates/>; <https://www.flgov.com/2018/10/10/gov-scott-issues-updates-on-hurricane-michael-as->

were subject to emergency evacuation orders, 6,700 people stayed in shelters, tens of thousands have lost power, and many roads are blocked by water and/or debris. *Id.*

3. Given the updated news reports regarding the scope of Hurricane Michael's impact on Florida and the 35 counties in particular, Plaintiffs respectfully amend their request for relief as follows:

a. Preliminarily and permanently enjoin Defendants from enforcing the current October 9, 2018 voter registration deadline.

b. Order Defendant to extend Florida's voter registration deadline by at least one full business day (either from the later of the date of this order or the day that the county election office reopens) in all of the 35 counties subject to Governor Scott's state of emergency order; and that the extension apply to both in-person and online voter registrations.

c. Order Defendant to issue a directive to the Supervisors of Election for the 35 counties subject to Governor Scott's state of emergency order.

d. Order Defendant to take all reasonable steps to notify the public of the extension of the deadline, including contacting media outlets in the affected areas, publishing a statement on the Secretary of State's website, and posting on social media.

e. Award Plaintiffs their costs, expenses, and reasonable attorneys' fees pursuant to, inter alia, 42 U.S.C. § 1988 and other applicable laws.

f. Grant such other relief as the Court deems just and proper.

Dated: October 11, 2018

Respectfully submitted,

/s/ Nancy G. Abudu

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CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2018, I electronically filed the foregoing document with the Clerk of Court by using CM/ECF, which automatically serves all counsel of record for the parties.