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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF IDAHO  
SOUTHERN DIVISION**

IDAHO FEDERATION OF TEACHERS et al.,

*Plaintiffs,*

v.

RAÚL LABRADOR, in his official capacity as  
Attorney General of the State of Idaho, et al.,

*Defendants.*

Case No. 1:23-cv-353

**MOTION FOR PRELIMINARY  
INJUNCTION**

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**MOTION FOR PRELIMINARY INJUNCTION**

Under Federal Rule of Civil Procedure 65(a), Plaintiffs Idaho Federation of Teachers; University of Idaho Faculty Federation, Local 3215 of the American Federation of Teachers; Aleta Quinn; Casey Johnson; Markie McBrayer; Zachary Turpin; Kathryn Blevins; and Heather Witt move for a preliminary injunction against Raúl Labrador, in his official capacity as Attorney General of the State of Idaho; Jan M. Bennetts, in her official capacity as Ada County Prosecuting Attorney; Stephen F. Herzog, in his official capacity as Bannock County Prosecuting Attorney; and Bill Thompson, in his official capacity as Latah County Prosecuting Attorney, to prohibit enforcement of the No Public Funds for Abortion Act’s prohibitions with respect to “promot[ing] abortion” and “counsel[ing] in favor of abortion.” Idaho Code §§ 18-8705(1), (2). Plaintiffs’ arguments in support of this motion are fully set forth in the attached memorandum of law and supporting declarations.

Dated: August 8, 2023

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 8, 2023, I filed the foregoing Motion for Preliminary Injunction electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Not Applicable (no defendant has yet appeared)

And I FURTHER CERTIFY that on such date I caused the foregoing, along with all attendant Declarations and Exhibits, to be served on the following non-CM/ECF registered participants *via* Electronic mail with a hard copy to follow via U.S. first class mail, postage prepaid addressed as follows:

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