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**Motions for admission pro hac vice forthcoming*

**IN THE FEDERAL DISTRICT COURT
DISTRICT OF WYOMING**

ALFREDO GUILLERMO
SANCHEZ, and DAVID
CHRISTOPHER BALL,

Plaintiffs,

v.

BRIDGET HILL, Wyoming
Attorney General and MARK
GORDON, Governor of Wyoming,
et al.,

Defendants.

Civil Case Number:

22-CV-47

MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Alfredo Guillermo Sanchez and David Christopher Ball (Plaintiffs) move the Court for a Preliminary Injunction pursuant to Federal Rule of Civil Procedure 65 to enjoin Defendants and those working in concert with them from enforcing the 24/7 Sobriety Program Wyoming Statutes § § 7-13-08 and 7-13-09 and Administrative Rule 0015.0017 Chapters 1 and 2 of the 24/7 Sobriety Program against the Plaintiffs and all other pretrial participants.

As set forth in the accompanying legal memorandum, supporting exhibits and Declarations, (1) Plaintiffs are substantially likely to succeed on the merits; (2) Plaintiffs will suffer irreparable injury if the injunction is denied; (3) Plaintiffs' threatened injury outweighs the injury the opposing party will suffer under the injunction; and (4) the injunction would not be adverse to the public interest. Plaintiffs are therefore entitled to immediate relief and respectfully request that this Court grant their motion for a preliminary injunction.

Pursuant to Local Rule 7.1(a), Plaintiffs request oral argument on their motion.

Pursuant to Local Rule 7.2(B) the proposed brief contains 25 pages, not including the Cover, Table of Contents, Certificate of Compliance and Certificate of Service.

This 7th day of March 2022.

KILLMER, LANE & NEWMAN, LLP

/s/ Darold W. Killmer

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Counsel for the Plaintiffs

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CERTIFICATE OF SERVICE

I certify that on the 7th day of March, 2022, I electronically filed the foregoing motion with the Clerk of the Court for the United States District Court for the District of Wyoming by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

/s/ Darold W. Killmer
Darold W. Killmer