

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA  
CENTRAL DIVISION

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Jalesha Johnson, Louise Bequeaith, Brad  
Penna, Brandi Ramus, and Haley Jo Dikkers,

Plaintiffs,

v.

Stephan K. Bayens, Commissioner of the  
Iowa Department of Public Safety, *in his  
official and individual capacities*, Lieutenant  
Steve Lawrence, Iowa State Patrol District  
16 Commander, *in his official and individual  
capacities*, and Sergeant Tyson Underwood,  
Assistant District 16 Commander, *in his  
individual capacity*, Iowa State Patrol  
Trooper Durk Pearston (Badge Number  
168), *in his individual capacity*, and Iowa  
State Patrol Trooper John Doe #1, *in his  
individual capacity*.

Defendants.

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Docket No. 20-306

**Plaintiffs' Motion  
for a Preliminary Injunction**

EXPEDITED RELIEF REQUESTED

Plaintiffs move for a preliminary injunction pursuant to Fed. R. Civ. P. Rule 65 to prevent further irreparable injury pending a final adjudication of this action.

As set forth in the accompanying Brief in Support of Plaintiff's Motion for a Preliminary Injunction, Plaintiffs are likely to succeed on their claim challenging the bans as unconstitutional prior restraints on First Amendment rights; they are suffering continuing irreparable injury; and the balance of the equities weighs in Plaintiffs' favor.

This Motion is supported by the accompanying Brief in Support of Plaintiff's Motion for a Preliminary Injunction and the Declarations of Plaintiffs, attached to this Motion, as well as all attachments and exhibits thereto.

Dated this 5th day of October, 2020

Respectfully submitted:

/s/ Rita Bettis Austen

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**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I electronically filed the foregoing paper with the Clerk of Court by using the CM/ECF system.

The foregoing paper will also be served along with the Complaint and Summons to all Defendants.

Date: October 5, 2020

/s/Rita Bettis Austen  
Rita Bettis Austen