

UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO

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COMMON CAUSE OF COLORADO, on behalf of itself :
and its members; MI FAMILIA VOTA EDUCATION :
FUND; and SERVICE EMPLOYEES INTERNATIONAL :
UNION, on behalf of itself and its members, :
: Civil No. 08-cv-2321
Plaintiffs, :
: vs. :
MICHAEL COFFMAN, in his official capacity as :
Secretary of State for the State of Colorado, :
Defendant. :
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SUPPLEMENTAL FILING OF SPECIFIC REMEDIES

Pursuant to the Judge’s request, Plaintiffs respectfully seek the following relief from the Court:

- a. preliminarily enjoin and restrain Defendant from removing, canceling, updating, or otherwise changing the registration record or status of any voter in Colorado’s statewide voter registration database pursuant to C.R.S. 1-2-509(3) in any way that would prohibit a voter who presents herself to vote from casting a regular ballot or disqualify the voter’s timely and complete mail ballot;
- b. preliminarily enjoin and restrain Defendant from removing, canceling, updating, or otherwise changing the registration record or status of any voter in Colorado’s statewide voter registration database between now and November 4, 2008, for any reason not provided for in 42 U.S.C. § 1973gg-6(c)(2)(B) in any way that would cause a voter who presents herself to vote to be prohibited from casting a regular

ballot or cause the ballot of a voter who mails in a timely and complete ballot not to be counted;

- c. require Defendant to reinstate and/or restore the names of any and all voters whose registration record was removed, cancelled, updated, or otherwise changed in a manner precluding that voter from casting a regular ballot since May 13, 2008, for any reason not provided for in 42 U.S.C. § 1973gg-6(c)(2)(B), and permit such voters who appear at the polls during Early Voting and on Election Day to vote by regular ballot and permit such voters who mail in a timely ballot to have that ballot counted;
- d. require Defendant to reinstate and/or restore the names of any and all voters whose registration record was removed, cancelled, updated, or otherwise changed in a manner precluding those voters from casting a regular ballot in violation of 42 U.S.C. § 1973gg-6(d) and permit such voters who appear at the polls during Early Voting and on Election Day to vote by regular ballot and permit such voters who mail in a timely ballot to have that ballot counted;
- e. require Defendant, in the alternative to paragraph d, to provide lists to each county of the voters reinstated as described in paragraphs c and d (henceforth referred to as “reinstatement lists”), and require Defendant to instruct poll workers, county clerks, and other relevant local election officials to refer to these reinstatement lists when a voter does not appear on the regular rolls and permit all voters on the reinstatement lists to vote by regular ballot and further require Defendant to cause signs to be posted in all polling places informing voters that if their names do not appear on the

regular rolls, they have the right to have an election worker check to see if their names appear on the reinstatement list.

Plaintiffs further request that the Court:

- e. award Plaintiffs their attorneys' fees and costs in accordance with 42 U.S.C. § 1988 and 42 U.S.C. § 1973gg-9(c); and
- f. grant Plaintiffs such additional relief as the interests of justice may require, together with their costs and disbursements in maintaining this action.

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