

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

**LEAGUE OF WOMEN VOTERS OF
NEW HAMPSHIRE, *et al.*,**

Plaintiffs,

STEVE KRAMER, *et al.*,

Defendants.

Civil Action No. 1:24-cv-73-SM-TSM

**DEFENDANT LIFE CORPORATION'S OBJECTION TO PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

NOW COMES the defendant Life Corporation, by and through counsel, and respectfully submits the within Objection to Plaintiffs' Motion for Preliminary Injunction, stating as follows:

1. Plaintiffs seek to impose a sweeping, unworkable, and unjustified preliminary injunction, requiring Life Corporation ("Life") to review in detail every message for which it leases its dialing equipment, a requirement that is inconsistent with its established business model and would severely restrict Life's ability to conduct business, specifically providing a platform that allows its customers to send polling, fundraising, get-out-the vote, and other election-related communications. There is no justification for this relief.

2. Plaintiffs' request is particularly unfounded given that Life is not responsible for initiating the January 21, 2024, call that is the subject of the Complaint (the "Subject Call") – instead Plaintiffs' own Complaint makes clear that Defendant Kramer is entirely responsible for planning, creating, and sending out the Subject Call.

3. The Court should deny the motion for preliminary injunction because Plaintiffs have failed to come forward with evidence to sustain the substantial burden required to obtain

injunctive relief. In particular, Plaintiffs are unlikely to succeed on the merits of their claims against Life because: (a) they have failed to identify an actual, concrete injury sufficient to confer standing; (b) they have failed to articulate how Life could be liable under the Voting Rights Act; and (c) they have no claim under either the Telephone Consumer Protection Act (“TCPA”) or New Hampshire Election Laws.

4. Moreover, Plaintiffs have not shown a risk of irreparable harm where Life did not make the Subject Call and is no longer working with Defendant Kramer.

5. The balance of equities weighs clearly in Life’s favor and Plaintiffs’ proposed injunction would harm the public interest rather than further it – since the preliminary injunction would actually inhibit the distribution of important information regarding upcoming elections.

6. The Court should deny the plaintiffs’ Motion for Preliminary Injunction, for reasons more fully set forth in the accompanying Memorandum of Law.

WHEREFORE, the defendant Life Corporation respectfully prays this Honorable Court:

- A. Deny the plaintiffs’ Motion for Preliminary Injunction; and
- B. Grant such other and further relief as is just and equitable.

DATE: May 17, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this date upon all counsel of record via the ECF filing system.

/s/ Benjamin T. King
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