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21 *PRO SE* PLAINTIFFS

22 **IN THE UNITED STATES DISTRICT COURT**
23 **IN AND FOR THE NORTHERN DISTRICT CALIFORNIA**
24 **SAN FRANCISCO DIVISION**

25 FRANCIS DROUILLARD, MARK GALPERIN,
26 JOHN TURNACLIFF, CHRIS CARPINIELLO,
27 WALTER JENSEN, MATTHEW BENNETT
28 AND MIA CAMERA

Plaintiffs,

vs.

LYNDA ROBERTS in her official capacity as
MARIN COUNTY REGISTRAR OF VOTERS
AND SHIRLEY WEBER, PH.D., in her official
Capacity as CALIFORNIA SECRETARY OF
STATE,

Defendants.

Case No.: 24-cv-06969 – CRB

**REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF STAY**

I. NOTICE

1. Plaintiffs herein respectfully request the Court take Judicial Notice of:
 - a. On August 7, 2024, the Governor of Virginia issued Executive Order No. 35, a true and correct copy of which is attached here as **Exhibit A** that Plaintiff Drouillard personally located at:
<https://www.governor.virginia.gov/media/governorvirginiagov/governor-of-virginia/pdf/eo/EO-35-Comprehensive-Election-Security-Ensuring-Legal-Voters-and-Accurate-Counting---vF---8.7.24.pdf>
 - b. On October 7, 2024, the Virginia Coalition for Immigrant Rights et al. filed a Complaint for Declaratory and Injunctive Relief in U.S. District Court for the Eastern District of Virginia Alexandria Division, case No. 1:24-cv-1778 a true and United States' Brief In Support Of Its Motion For A Preliminary Injunction, a true and correct copy of which is attached here as **Exhibit B** that Plaintiff Galperin personally located at:
https://storage.courtlistener.com/recap/gov.uscourts.vaed.561386/gov.uscourts.vaed.561386.1.0_2.pdf
 - c. On October 11, 2024, the United States of America filed a complaint against the Commonwealth of Virginia alleging that Virginia violated Section 8(c)(2) of the National Voter Registration Act (NVRA), case No. 1:24-cv-1807, a true and correct copy of which is attached here as **Exhibit C** personally located by Plaintiff Galperin at:
<https://storage.courtlistener.com/recap/gov.uscourts.vaed.561740/gov.uscourts.vaed.561740.1.0.pdf>.
 - d. The case was consolidated with case No. 1:24-cv-1778. A Preliminary Order for Injunctive Relief was issued.
 - e. On October 27, 2024, the Virginia Secretary of State filed an Emergency Application for Stay of case No. 1:24-cv-1778 (U.S. 24-A407), a true and

1 correct copy of which is attached here as **Exhibit D** personally located by
2 Plaintiff Galperin at:

3 <https://www.supremecourt.gov/DocketPDF/24/24A407/330363/20241027>
4 [231346621_Application%20for%20Stay%20SCOTUS%20vpf.pdf](https://www.supremecourt.gov/DocketPDF/24/24A407/330363/20241027)

5 f. On October 30, 2024, the United States Supreme Court issued a stay in
6 case Nos. 1:24-cv-1778 and 1:24-cv-1807, a true and correct copy of
7 which is attached here as **Exhibit E** personally located by Plaintiff
8 Drouillard at:

9 https://www.supremecourt.gov/orders/courtorders/103024zr_f2ah.pdf.

10 2. These documents show that every matter at issue in the case before this Court
11 is at issue in *United States v. Beals*.

12 II. PROPOSED ORDER

13 1. In consideration of the stay by the U.S. Supreme Court in *Beals, Susan, et al.*
14 *v. VA Coalition for Immigration Rights, et al.*, 604 U.S., 24A407, October 30, 2024, this
15 Court orders a temporary stay to prevent prejudice in this action.
16

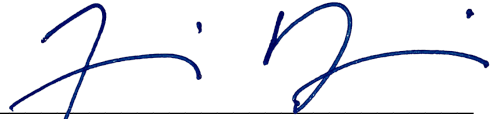
17 2. Plaintiffs hereby move the Court for an ORDER that:

- 18 a. Directs Defendant Roberts to intercept and sequester ballots returned by
19 ineligible voters.
- 20 b. Defendant Roberts is enjoined from opening envelopes of newly received
21 ballots from ineligible voters, or processing or counting those ballots.
- 22 c. Directs Defendant Roberts to provide this Court and Plaintiffs a list of any
23 names of voters who have already had their ballots counted or extracted
24 from the yellow return envelopes for the sole and exclusive purpose of
25 protecting the integrity of the results of the election. These names shall
26 not be disclosed or used for any other purpose.

27 3. This brief is supported by supplemental Declaration by Plaintiff Drouillard.
28

1 DATED: October 31, 2024,

Respectfully Submitted,

2 

3 _____
4 FRANCIS DROUILLARD (Pro Se)

5 *I, Francis Drouillard, attest, under penalty of*
6 *perjury, that the six Signatories below have*
7 *concurred in the filing of this request for*
8 *judicial notice.*

9 _____
10 /s/

11 MARK GALPERIN (Pro Se)

12 _____
13 /s/

14 JOHN TURNACLIFF (Pro Se)

15 _____
16 /s/

17 CHRIS CARPINIELLO (Pro Se)

18 _____
19 /s/

20 WALTER JENSEN (Pro Se)

21 _____
22 /s/

23 MATTHEW BENNETT (Pro Se)

24 _____
25 /s/

26 MIA CAMERA (Pro Se)