

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

JOHN W. JACKSON and SECOND)
AMENDMENT FOUNDATION, INC.,)
)
Plaintiffs,)
)
-against-)
)
GARY KING, in his Official Capacity as)
Attorney General of the State of New Mexico;)
and BILL HUBBARD, in his Official Capacity)
as Director of the Special Investigations)
Division of the New Mexico Department of)
Public Safety,)
)
Defendants.)

Case No. 1:12-CV-421

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

COME NOW the Plaintiffs, JOHN W. JACKSON and SECOND AMENDMENT FOUNDATION, INC., by and through undersigned counsel, and move for the entry of an order:

1. Preliminarily enjoining Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the injunction, from enforcing from enforcing the United States citizenship requirement of NMSA 1978 § 29-19-4(A)(1) against the Plaintiffs and/or their members;
2. Preliminarily enjoining Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the injunction, from enforcing any other sections of the New Mexico Statutes which restrict lawfully admitted aliens, including Plaintiffs and their members, firearms rights and privileges based on citizenship.
3. A Memorandum in Support of this Motion will be filed at or near the time of the filing of this Motion.

