## 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	)	Case No. 1:12-CV-421
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.	)	

## 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.

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Dated: August 9, 2012

David G. Sigale, Esq. (#6238103 (IL)) LAW FIRM OF DAVID G. SIGALE, P.C. 739 Roosevelt Road, Suite 304 Glen Ellyn, IL 60137 630.452.4547 dsigale@sigalelaw.com Admitted *pro hac vice*  Respectfully submitted,

Paul M. Kienzle, III., Esq. (#7592 (NM)) SCOTT & KIENZLE, P.A. P.O. Box 587 Albuquerque, NM 87103 (505) 246-8600 paul@kienzlelaw.com

By: /s/ David G. Sigale David G. Sigale

Attorneys for Plaintiffs