

EXHIBIT A

**(Plaintiffs' Proposed Order on Plaintiffs'
Emergency Motion for Preliminary Injunction)**

2. The Court takes judicial notice that on August 1, 2022, Defendant NCSBE voted unanimously to certify Plaintiff North Carolina Green Party (“NCGP”) as a new political party pursuant to N.C. GEN. STAT. § 163-96. [ECF No. 54.] Accordingly, at present, the Court concludes that it need not grant Plaintiffs the injunctive relief they request from that provision. The Court retains jurisdiction over Plaintiffs’ claims for relief from N.C. GEN. STAT. § 163-96.

3. Defendants are hereby **ENJOINED** from enforcing the July 1 filing deadline in N.C. GEN. STAT. § 163-98 as applied to NCGP and its candidates, particularly Matthew Hoh (nominee for United States Senate) and Michael Trudeau (nominee for State Senate).

4. NCGP candidates certified by the NCGP at its June 30, 2022 convention, namely Matthew Hoh and Michael Trudeau, must submit their notice of candidacy, filing fee, and application to change party affiliation to NCSBE, or the appropriate county board of elections, no later than August 12, 2022. In the event that any county board of elections declines to accept these submissions, NCSBE is hereby **ORDERED** to accept them. Provided that such candidates submit such materials on or before August 12, 2022, Defendants are hereby **ORDERED** to accept them as timely filed.

5. Defendants are further **ORDERED** to include the names of NCGP candidates who comply with the terms of this Order and who are qualified for the office they seek on North Carolina’s November 8, 2022 general election ballot.

6. The Court retains jurisdiction to enforce the terms of this Order through the November 8, 2022 general election.

7. The Court retains jurisdiction over all claims asserted by Plaintiffs to grant such further and additional relief as the Court deems appropriate, including declaratory relief, injunctive relief and an award of reasonable attorney’s fees and litigation costs pursuant to 42. U.S.C. § 1988.

SO ORDERED.

Dated: August __, 2022

James C. Dever III
United States District Judge