

THE UNIVERSITY OF KANSAS STUDENT COURT OF APPEALS

Mady Womack	)	April 9, 2017
OneKU Presidential Candidate	)	
	)	
Jonathan Ehrlich	)	
OneKU Candidate for the School of Law	)	
	)	Case Number: xxxx
	)	
Petitioner	)	
	)	
VERSUS	)	
	)	
Harrison Baker	)	
Elections Commission Compliance Chair	)	

PETITION FOR PRELIMINARY INJUNCTIVE RELIEF

Pursuant to SSRR Appendix P Part III Rule 15, petitioner Mady Womack hereby moves this court for a preliminary injunction prohibiting the Elections Commission from enforcing its decision to remove 47 students (hereinafter “the candidates”) from participating in the upcoming Student Senate election.

Grounds for this motion include (1) the integrity of the student body may be compromised, (2) the integrity of the Student Government may be compromised, (3) the Election Committee’s actions may be illegal, (4) that Petitioner, the coalition she represents, other University of Kansas student-candidates, each school of the University of Kansas, the entire university community, and other collegiate governance bodies will be irreparably harmed, (5) that Petitioner is likely to succeed on the merits of her case, and (6) that an injunction would serve the university community and greater community good.

The integrity of the entire election is in jeopardy without these students on the ballot while the appeal is processed. These students will be unable to effectively reach out to their individual constituencies due to their uncertainty of their status. Any delay in putting these

students on the ballot will severely hamper their chances of winning a Senate seat should the Commission's decision be overturned. The Court should err on the side of the students declared "invalid," as any time lost that could have been spent campaigning cannot be made up and these students will inevitably be "punished" by their inability to campaign when the election commences.

Petitioner argues, as outlined in the accompanying Writ of Certiorari, that the Elections Commission did disqualify 47 University of Kansas students from participating in the 2017 Student Senate election. In doing so, the Elections Commission violated the Student Senate Rules and Regulations, violated its responsibility to fairly enforce the election rules of Student Senate, and may have violated the Due Process rights (under the 14th Amendment of the United States Constitution) of the student-candidates it disqualified. Should the Court find that the candidates were improperly disqualified, they would have lost critical time campaigning in the days leading up to the election. Given the seriousness of these violations along with the election rapidly approaching, it is imperative that the Court issue temporary relief. Petitioner asks the Court to restore the impacted students to the Spring Election ballot, and allow them to continue campaigning while the Court processes the appeal.

Respectfully submitted,

/s/

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Mady Womack  
OneKU Presidential Candidate

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Jonathan Ehrlich  
OneKU Candidate for the School of Law