

4. The injunction should issue without bond.
5. In further support of this motion Justin Vasel relies on his Verified Complaint and memorandum of law, both of which are incorporated by reference.

WHEREFORE, Justin Vasel requests that this Court issue its preliminary injunction enjoining Sections 253 through 266 of HEA 1001, Indiana Code §§ 21-20-3-2 through 21-20-2-13 (eff. May 6, 2025), so that the election scheduled to begin on June 1, 2025 for a member of the Indiana University Board of Trustees may take place and so the winner of that election may begin their term on July 1, 2025., and for all other proper relief.

/s/ Kenneth J. Falk

Kenneth J. Falk
No. 6777-49

/s/ Gavin M. Rose

Gavin M. Rose
No. 26565-33

/s/ Stevie J. Pactor

Stevie J. Pactor
No. 35657-49
ACLU of Indiana
1031 E. Washington St.
Indianapolis, IN 46202
317/635-4059
fax: 317/635-4105
kfalk@aclu-in.org
grose@aclu-in.org
spactor@aclu-in.org

Attorneys for Plaintiff

Certificate of Service

I hereby certify that a copy of the foregoing was served on the below-name persons
by first-class U.S. postage, pre-paid, on this 7th day of May, 2025.

Governor Mike Braun
Indiana State House
200 W. Washington St. – Room 206
Indianapolis, IN 46204

Attorney General Todd Rokita
IGCS-5th Floor
302 W. Washington St.
Indianapolis, IN 46204

/s/ Kenneth J. Falk
Kenneth J. Falk
Attorney at Law