

JARED NALLY, ET AL.,

*Plaintiffs*

Campus Expression Policy because Plaintiffs are likely to succeed on the merits of their challenges to the Campus Expression Policy. First, by restricting a broad range of students' protected expression, the Campus Expression Policy is overbroad in violation of the First Amendment.

3. Second, by requiring adherence to amorphous and inherently subjective CIRCLE values, the Campus Expression Policy is unconstitutionally vague because it fails to give students notice of what expression is prohibited and invites arbitrary enforcement by giving administrators unbridled discretion in violation of the First and Fifth Amendments.

4. Moreover, the chilling effect on Plaintiffs' expressive and due process rights constitutes an irreparable harm.

5. Additionally, the balance of equities favors Plaintiffs, as Defendants cannot present any interest that outweighs Plaintiffs' interest in the enjoyment of their constitutional rights.

6. Granting a preliminary injunction would also further the public interest because it would protect the expressive and due process rights of hundreds of other Haskell students.

7. Finally, this Court should waive Rule 65(c)'s bond requirement because this is a public-interest lawsuit and imposing a preliminary injunction poses no risk of financial loss to Defendants.

8. Accordingly, Plaintiffs respectfully request that this Court preliminarily enjoin Defendants from enforcing the portion of the Campus

Expression Policy that makes students' expressive rights contingent upon compliance with the CIRCLE values. This includes taking any action to investigate, threaten, or punish students for violations of that po

