

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA**

THE STATE OF LOUISIANA, by and through  
its attorney general, JEFF LANDRY, et al.,  
PLAINTIFFS,

v.

HORSERACING INTEGRITY AND  
SAFETY AUTHORITY, INC., et al.,  
DEFENDANTS.

CIVIL ACTION No. \_\_\_\_\_

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR A TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

This Court has considered the motion for a temporary restraining order and preliminary injunction filed by Plaintiffs; the submissions of Defendants; and the evidence and pleadings of record, and finds that (1) Plaintiffs are likely to succeed on the merits of their claims that the Horseracing Integrity and Safety Authority ("HISA") rules are procedurally and substantively unlawful; (2) Plaintiffs will suffer irreparable injury unless injunctive relief is issued; (3) the threatened injury to Plaintiffs outweighs possible harm that the injunction may cause the opposing parties; and (4) the injunction is in the public interest. *Opulent Life Church v. City of Holly Springs, Miss.*, 697 F.3d 279, 288 (5th Cir. 2012); *Karaha Bodas Co. v. Perusahaan Pertambangan*, 335 F.3d 357, 363 (5th Cir. 2003).

Because Plaintiffs have clearly established their burden of persuasion on each of the four elements required for injunctive relief, Plaintiffs' motion is **GRANTED**. Accordingly,

**IT IS ORDERED** that Defendants; their servants, agents, and employees; and all persons in active concert or participation with them, who receive actual Notice of this Order, and until a full trial on the merits is had, are hereby enjoined from enforcing the HISA rules, or promulgating or implementing any actions taken pursuant to the HISA;

**IT IS FURTHER ORDERED** that Defendants shall file with this Court and serve on Plaintiffs within \_\_\_ days from the date of entry of this Order a report in writing setting forth in detail the manner in which Defendants have complied with the terms of this Order; and

**IT IS FURTHER ORDERED** that this Order shall become effective immediately and shall expire at \_\_\_ o'clock a.m./p.m. on \_\_\_\_\_, unless it is further extended by order of this Court.

Signed this \_\_\_ day of \_\_\_\_\_, 2022

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**UNITED STATES DISTRICT JUDGE**