

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

RHONDA LEONA BROWN	:	
FLEMING, et al.	:	
	:	CASE NO. 1:18-cv-2041
PLAINTIFFS,	:	
	:	JUDGE HOGAN
VS.	:	
	:	REQUEST FOR EMERGENCY
	:	ORAL HEARING
THE CHEROKEE NATION, et al.	:	
	:	
DEFENDANTS.	:	

**RENEWED MOTION OF RHONDA LEONA BROWN FLEMING FOR A
PRELIMINARY INJUNCTION**

In accordance with the provisions of Fed. R. Civ. P. 65 and the attached Affidavits and Statement of Plaintiff, Rhonda Leona Brown Fleming, Ms. Fleming respectfully moves for a preliminary injunction that prohibits the Defendants The Cherokee Nation, The Cherokee Nation Election Commission, The Department of Interior and Principal Chief Bill John Baker from taking any and all further measures toward conducting an election for Principal Chief of the Cherokee Nation on June 1, 2019, or enforcement of Section 2, Article 7 of the Cherokee Constitution that limits eligibility for election to the office of Principal Chief of the Cherokee Nation to Cherokees who have resided within the boundaries of the Cherokee Nation for at least 270 days prior to the election. An immediate order is required for the reason on March 12, 2019, the Cherokee Supreme Court issued the unlawful Order at Exhibit A, that disqualified Rhonda Fleming as a candidate on the ground she failed to meet the 270 day requirement and did not appear for hearing. Attached at Exhibit B is the statement of

Ms. Brown concerning why she was not required to meet the 270 day limit and was her appearance and response to the challenge filed to her candidacy. Ms. Fleming has exhausted all internal Tribal and administrative remedies available to her. She is being irreparably harmed by the violation of her right as a Freedman member of the Cherokee Tribe. For these and the additional reasons set forth the motion for preliminary injunction previously filed, ECF Docket no.2, it is respectfully requested that an order issue enjoining the June 1, 2019 election pending a hearing on this motion and the previously filed motion for a preliminary injunction..

In support of this motion Ms. Brown hereby incorporates all previously filed documents at Dockets No. 2.

An immediate oral hearing is requested.

Respectfully Submitted,

s/Percy Squire, Esq.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent March 22, 2019 via the Court's electronic mailing system upon counsel of record.

s/Percy Squire, Esq.
Percy Squire, Esq. (0022010)