

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

NORTH CAROLINA DEMOCRATIC  
PARTY,

Plaintiff,

v.

Civil Action No. 1:16-cv-01288

NORTH CAROLINA REPUBLICAN PARTY,  
DONALD J. TRUMP FOR PRESIDENT, INC.,  
ROGER J. STONE, JR., and STOP THE  
STEAL INC.,

Defendants.

**PLAINTIFF’S NOTICE OF MOTION AND MOTION FOR A TEMPORARY  
RESTRAINING ORDER AND/OR PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE THAT, pursuant to Rule 65 of the Federal Rules of Civil Procedure, and for the reasons stated in the Complaint filed November 3, 2016 and the accompanying Memorandum of Law, Plaintiff North Carolina Democratic Party hereby moves this Court for a Temporary Restraining Order and/or Preliminary Injunction granting the temporary and preliminary relief sought in the Complaint. In particular, Plaintiff respectfully seeks a Temporary Restraining Order and/or Preliminary Injunction restraining and enjoining Defendants—as well as their agents, employees, successors, and attorneys, and all persons in active concert and participation with them—from advancing their conspiracy to intimidate, threaten, harass, or coerce voters in violation of Section 11(b) of the Voting Rights Act, 52 U.S.C. § 10307(b), and the Ku Klux Klan Act of 1871, 42 U.S.C. § 1985(3).

Pursuant to Rule 65(1) of the Federal Rules of Civil Procedure and Rule 5.3(b) of the Local Rules of Civil Procedure, Plaintiff has provided actual notice to Defendants as of the time of making this Motion, and has provided copies of all pleadings and papers filed in this action to date.

November 4, 2016

/s/ John R. Wallace

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 4, 2016, a copy of the foregoing Notice of Motion and Motion for a Temporary restraining Order and/or Preliminary Injunction was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served in accordance with the Federal Rules of Civil Procedure. Parties may access this filing through the Court's System.

11/04/2016

Respectfully submitted,

/s/ John R. Wallace

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