

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PENNSYLVANIA DEMOCRATIC
PARTY,

Plaintiff,

v.

REPUBLICAN PARTY OF
PENNSYLVANIA, DONALD J.
TRUMP FOR PRESIDENT, INC.,
ROGER J. STONE, JR., STOP THE
STEAL INC.,

Defendants.

Civ. No. 16-5664

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

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff Pennsylvania Democratic Party hereby moves this Court for a Temporary Restraining Order and/or Preliminary Injunction granting the temporary and preliminary relief sought in the attached 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(a) of the Federal Rules of Civil Procedure and Rule 7.1(d) 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.

For the reasons set forth in Plaintiff's accompanying Memorandum of Law and supporting declaration, which are incorporated by reference, Plaintiff respectfully requests that the Court grant this Motion and enter an Order in substantially the form of the proposed order filed contemporaneously herewith.

Respectfully submitted,

November 3, 2016

/s/ Michael J. Gottlieb

Michael J. Gottlieb
BOIES, SCHILLER & FLEXNER
LLP
5301 Wisconsin Ave, N.W.
Washington, DC 20015
(202) 237-2727
mgottlieb@bsfllp.com

Marc E. Elias
PERKINS COIE LLP
700 13th Street, Suite 600
Washington, DC 20005
Tel: (202) 434-1609

Fax: (202) 654-9126
melias@perkinscoie.com

Mark A. Aronchick
HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER
One Logan Square, 27th Floor
Philadelphia, PA 19103
(215) 496-7002
maronchick@hangley.com

Dawn L. Smalls
BOIES, SCHILLER & FLEXNER
LLP
575 Lexington Avenue
New York, NY 10022
(202) 754-4216
dsmalls@bsfllp.com

CERTIFICATE OF SERVICE

I, Michael J. Gottlieb, hereby certify and declare, under penalty of perjury, that I have caused to be served, on this date, a copy of the foregoing Motion and any attached pages upon the parties and in the manner indicated below:

REPUBLICAN PARTY OF PENNSYLVANIA
112 State Street
Harrisburg, PA 17101

Service by personal messenger

DONALD J. TRUMP FOR PRESIDENT, INC.
725 Fifth Avenue
New York, NY 10022

Service by electronic service, per agreement with counsel for Donald J. Trump for President, Inc.

ROGER J. STONE, JR.
3843 South Bristol Street Suite 312
Santa Ana, CA 92704

Service by overnight Federal Express, postage prepaid

STOP THE STEAL INC.
3843 South Bristol Street Suite 312
Santa Ana, CA 92704

Service by overnight Federal Express, postage prepaid

/s/ Michael J. Gottlieb

Michael J. Gottlieb
BOIES, SCHILLER & FLEXNER
LLP
5301 Wisconsin Ave, N.W.
Washington, DC 20015
(202) 237-2727

mgottlieb@bsfllp.com

Attorney for Plaintiff

Dated: November 3, 2016