

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

JAMES PATRICK O'DONOGHUE, Pro se
Plaintiff

v.

Civil Action No.: 1:17-CV-11701-PBS

BOARD OF REGISTRARS, CITY OF LAWRENCE,
ET AL
Defendants

MOTION FOR INJUNCTION

Now comes the Plaintiff, James Patrick O'Donoghue, a candidate for Mayor of Lawrence requesting that an Injunction be granted with URGENCY as the Preliminary Election for Mayor of Lawrence is scheduled to be held on Tuesday, September 26, 2017, and the ballots may have been printed without the Plaintiff's name included as a candidate. It is recalled that in 2013 when the Plaintiff was a candidate for Mayor that the City Clerk or Board of Registrars misspelled his name on the ballot and had to reprint all of the ballots over again.

In this current instance the Board of Registrars has denied the Plaintiff entry onto the ballot by abridging the rights of voters. In some cases persons initially registered to vote through the Commonwealth's Registry of Motor Vehicles. When they later returned to change the address on their driver's license the new address did not follow them as expected. The Plaintiff took steps to re-register voters to reflect their changes of address before the Board of Registrars Hearing took place. The Board of Registrars abridged those voters rights. The Board of Registrars also abridged the rights of 65 additional signers due to their having signed for another candidate. MGL Ch. 34 Section 111 should be declared unconstitutional (see Exhibit C). The Mayor and other of the City of Boston have sought to overthrow it in their city because it limits (abridges) voter's rights (See Exhibit D).

It is imperative that with URGENCY this Motion be prayerfully acted upon quickly in order not to delay the election of a new Mayor in 2017 to be sworn in in January of 2018 without allowing the Board of Registrars to trample upon the voter rights of James Patrick O'Donoghue and his Nomination Papers Signers as well as the opportunity that this presents to all of the voters and candidates in Lawrence (See Exhibit A which demonstrates unity among citizens and some of the opposing candidates with regard to the Grievance of abridgment offenses).

James Patrick O'Donoghue, Pro se September 8, 2017

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FILED
IN CLERK'S OFFICE
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U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

9/26/17
Depend on no ground
Next plaintiff case not demonstrate
G. abridgment of voters on a federal claim.