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4 Plaintiffs in pro per

5  
 6 UNITED STATES DISTRICT COURT  
 7 DISTRICT OF ARIZONA  
 8

9 Janis Kaighn, Gregory R. Kaighn

10 Plaintiffs,

11 vs.

12 United States of America, State of  
 Arizona, City of Prescott, Yavapai  
 County, Prescott City Court, Sheila Polk,  
 13 Yavapai County Attorney in her official  
 capacity, Jon Paladini, Prescott City  
 14 Attorney in his official capacity, Glenn  
 Savona, Prescott Deputy City Attorney in  
 15 his official capacity, Andy Reinhardt,  
 16 City of Prescott Deputy Police Chief in  
 his official capacity,

17 Defendants.  
 18

CASE NO: CV-16-08079-PCT-SPL

PLAINTIFFS EX PARTE MOTION(S)  
 FOR TEMPORARY RESTRAINING  
 ORDERS STOPPING ALL  
 CRIMINAL PROSECUTIONS OF  
 PLAINTIFF(S)

19 Applicants Janis Kaighn and Gregory R. Kaighn declare as follows:

20 1. We are the plaintiffs in this action and we are married to each other. We make this  
 21 Application/Declaration based on our own personal knowledge, under penalty of perjury  
 22 pursuant to the laws of the United States and the State of Arizona, and if called as witnesses can  
 23 and will testify competently hereto.

24 2. Gregory R. Kaighn is a duly licensed member in good standing of the California Bar,  
 25 State Bar No. 124049. Mr. Kaighn is admitted to practice in all four California Districts of the  
 26 United States Courts and to the Ninth Circuit Court of Appeals. Mr. Kaighn has "e file"  
 27 accounts in the Eastern and Central Districts of California, and the Ninth Circuit Court of  
 28 Appeals.

3. Although only licensed in California, Mr. Kaighn has made a number of appearances in the courts of other States. He has been co counsel and admitted pro hoc vice in the Oregon State Courts. He has handled discovery matters in Colorado, Nevada, and Washington State Courts. He appeared on behalf of a witness in a Utah State Court matter. Mr. Kaighn has been an expert witness in both Florida and California on insurance coverage issues. He is also an expert on many aspects of Arizona election law.

4. Good cause exists for our decision to not give notice to the adverse parties of our intention to file this ex parte motion. This case is very dangerous and our lives are in grave jeopardy. The conduct in this case includes the "unthinkable." Plaintiffs must avoid any possibility that anyone could interfere with our ability to file this case.

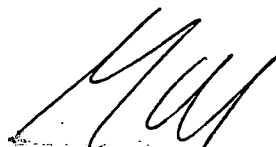
5. As discussed in our Memorandum of Points and Authorities filed herewith, we believe that the facts are largely beyond dispute with respect to most of the essential allegations of the Verified Complaint. **Our Request for Immediate Relief is focused on the pending criminal charges and our Request For Arrest Warrants. Those are both local Arizona matters that effect our safety and the safety of the general public.**

6. The Verified Complaint also contains lengthy exhibits and we do not expect the Court to be able to instantly rule on our request for Temporary Restraining Orders. That said, we hope that the Court can rule as soon as possible due to the danger of further and/or permanent damage or harm occurring.

6. We respectfully request oral argument via telephone pursuant to Local Rule 7.2 (f) and (h) for this and any other matters that the Court sets for hearing. It is far too dangerous for us to come to Court the traditional way at this time.

Dated: April 25, 2016

By

  
Gregory R. Kaighn  
Janis Kaighn 