

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

LORI HICKS,

Plaintiff,

v.

ROBERTSON COUNTY ELECTION  
COMMISSION,

Defendant.

Case No. \_\_\_\_\_

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**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER**

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Pursuant to Federal Rule of Civil Procedure 65, Plaintiff hereby moves for a temporary restraining order requiring the nominal Defendant, the Robertson County Election Commission to register Plaintiff to vote and allow her to vote in the upcoming November 6, 2018 election (the "Election").

As set forth more fully in the Verified Complaint and the accompanying Memorandum of Law in Support of this Motion, the Robertson County Election Commission violated the National Voter Registration Act, 52 U.S.C. § 20501, *et seq.*, (the "NVRA") in illegally purging Plaintiff's voter registration without the adequate notice required by Section 20507 of the NVRA. Plaintiff requests immediate action from this Court to rectify this wrong and allow her to cast a ballot in the November 6, 2018 Election thereby allowing Plaintiff to participate in this most important civic institution. Plaintiff needs immediate relief so she can exercise her voting rights.

In support of this motion, Plaintiff relies upon:

- (1) the Verified Complaint; and
- (2) the memorandum of law submitted herewith.

An appropriate Temporary Injunction Order is attached hereto as Exhibit A.

Because the Election is tomorrow, Plaintiff respectfully requests an immediate hearing on the Motion for Temporary Injunction to be had on Monday, November 5, 2016. Counsel for Plaintiff can make themselves available at the Court's convenience.

Dated: November 5, 2018

Respectfully submitted,

/s/Benjamin A. Gastel

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 5, 2016, the foregoing was served via  
U.S. Mail, pre-paid postage, and Electronic Mail upon:

Cathy Hamsley, Administrator of Elections  
513 S. Brown Street  
Robertson Co Office Bldg, Room 137  
Springfield, TN 37172-2941  
Phone: (615) 384-5592  
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/s/ Benjamin A. Gastel  
Benjamin A. Gastel