

Rajiv D. Parikh, Esq.
Brett M. Pugach, Esq.
GENOVA BURNS LLC
494 Broad Street
Newark, New Jersey 07102
Tel: (973) 533-0777
Fax: (973) 533-1112
rparikh@genovaburns.com
Attorneys for Plaintiff,
New Jersey Democratic State Committee

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

NEW JERSEY DEMOCRATIC STATE
COMMITTEE,

Plaintiff,

v.

NEW JERSEY OATH KEEPERS, an
unincorporated New Jersey association,
Defendant.

Civil Action No.: _____

**ORDER TO SHOW CAUSE
SEEKING
PRELIMINARY INJUNCTIVE
RELIEF**

THIS MATTER having been brought before the Court by Plaintiff New Jersey Democratic State Committee, through its counsel, by Order to Show Cause seeking temporary restraints and a preliminary injunction pursuant to Federal Rule of Civil Procedure 65 and L. Civ. R. 65.1, and upon the Complaint, Declarations and Memorandum of Law submitted herewith the Court having determined that good and sufficient reasons exist to proceed by way of Order to Show Cause, and for good cause shown.

IT IS on this _____ day of _____, 2016,
ORDERED that Defendant appear and show cause on the 7th day of November, 2016, before the United States District Court for the District of New Jersey, Hon. _____, at the

Martin Luther King Building and U.S. Courthouse, 50 Walnut St #4015, Newark, NJ 07102, at _____ o'clock in the _____ noon, or as soon thereafter as counsel can be heard, why an Order should not be entered:

1. Preliminarily enjoining and restraining the Defendants from:
 - a. Funding, encouraging, or otherwise supporting, including by training or organizing, individuals to be present at or around polling places or voter lines to challenge, investigate, interfere, or otherwise act to prevent any person from voting, including but not limited to confronting potential voters and verifying their eligibility at the polls in any manner not explicitly authorized by New Jersey law, distributing literature (and/or stating) to individuals that voter fraud is a crime, or describing the penalties under any State or Federal Statute for impermissibly casting a ballot.
 - b. Monitoring polling places, or permitting, encouraging, or assisting individuals to monitor polling places, including but not limited to confronting potential voters and verifying their eligibility at the polls, distributing literature (and/or stating) to individuals that voter fraud is a crime, or describing the penalties under any State or Federal Statute for impermissibly casting a ballot, if the proposed monitor does not comply with the statutory requirements for such monitoring activities under New Jersey law;
 - c. Gathering or loitering outside of any polling place for the purpose or with the effect of interfering with or intimidating voters;
 - d. Questioning, interrogating, interfering with, or verbally harassing voters or prospective voters, or training, organizing, or directing others to do the same, with the sole exception of questioning that is explicitly authorized by New Jersey law;
 - e. Following, taking photos of, or otherwise recording prospective voters or voters, those assisting prospective voters or voters, or their vehicles, or training, organizing, or directing others to do the same;
 - f. Questioning voters, and training, organizing, or deputizing any persons to question voters, at New Jersey polling locations under the guise of purported "exit polling" or "citizen journalist" operations; or
 - g. Otherwise organizing efforts to engage in voter intimidation.
2. Granting such other relief as the Court deems equitable and just.

And it is further ORDERED that:

1. A copy of this Order to Show Cause, Complaint, supporting affidavits, declarations or certifications, and Memorandum of Law submitted in support of this application, together with a summons, shall be served upon the Defendant personally within _____ (____) days of the date hereof, in accordance with Fed. R. Civ. P. 4.
2. The Plaintiff must file with the Court its proof of service of the pleadings on the Defendants no later than _____ (____) days before the return date.
3. Defendant shall file and serve its written response to this Order to Show Cause and proof of service on Plaintiff by _____, November __, 2016, and shall hand deliver a courtesy copy directly to Judge _____ at the following address: _____, New Jersey.
4. Plaintiff must file and serve any written reply to Defendant's opposition to the Order to Show Cause by __, 2016. A courtesy copy of the reply papers must be sent directly to the chambers of Judge _____.
5. If Defendant does not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date, and relief may be granted by default, provided that Plaintiff files a proof of service and a proposed form of Order at least _____ (____) days prior to the return date.
6. If Plaintiff has not already done so, a proposed form of Order addressing the relief sought on the return date (along with a self-addressed return envelope with return address and postage) must be submitted to the Court no later than _____ (____) days before the return date.
7. In accordance with Local Civil Rule 78.1, the Court will notify the parties whether it will entertain argument on the return date of the Order to Show Cause.

U.S.D.J.