

FILED

2018 JUN 28 AM 11:09

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA**

CLERK, US DISTRICT COURT
MIDDLE DISTRICT OF FL
OCALA FLORIDA

BRUCE FREDERIC NATHAN,)
)
 Plaintiff)

vs.)
)

REPUBLICAN NATIONAL COMMITTEE;)
DEPARTMENT OF STATE, DIVISION OF;)
ELECTIONS;)
REPUBLICAN PARTY OF FLORIDA;)
FOX NEWS NETWORK, LLC)
)
 Defendants)

CASE NO. 5:18-cv-331-oc-30/PRL

JURY TRIAL DEMANDED(12)

**PLAINTIFF’S EMERGENCY MOTION FOR A TEMPORARY RESTRAINING
ORDER AND PRELIMINARY INJUNCTION AGAINST DEFENDANTS**

Plaintiff, BRUCE FREDERIC NATHAN, pursuant to Federal Rules of Civil Procedure Rule 65, hereby moves this Honorable Court for entry of an Emergency Temporary Restraining Order and Preliminary Injunction enjoining Defendants from engaging in, and or, perpetuating further discriminatory and unconstitutional conduct and conduct in violation of U.S.C.

1. On June 28, 2018, Defendant Fox News Network, LLC has scheduled a live debate.
2. Plaintiff is discriminatorily, unconstitutionally, conspiratorially, and in violation of U.S.C. wrongfully excluded from the debate referenced in ¶ 1 above.

3. Plaintiff has thus far been discriminatorily, unconstitutionally, conspiratorially, and in violation of U.S.C. wrongfully denied equal time.
4. Plaintiff respectfully moves this honorable court to restrain and enjoin further discriminatory, unconstitutional, conduct that is also in violation of U.S.C.

This Emergency Motion is supported by a concurrently filed Memorandum in Support of PLAINTIFF'S EMERGENCY MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION AGAINST DEFENDANTS.

WHEREFORE, PREMISES CONSIDERED, PLAINTIFF PRAYS:

That the Defendants, and all persons acting on their behalf, be enjoined from: (1) discriminatory conduct, (2) unconstitutional conduct, (3) conduct that is in violation of 47 U.S.C. § 315(a), (4) conspiring to deprive right of free speech and equal time, and (5) any other conduct to be further alleged in violation of U.S.C. in an amended complaint filed pursuant to Fed. R. Civ. P. Rule 15, in response to any 12(b) motion that may be submitted to this Honorable Court.

Respectfully submitted,

/s/Christopher Edward Hallett
CHRISTOPHER EDWARD HALLETT, ESQ
E~Clause® LLC, (CEO)
(Lic. No. 443079 / Bar No. 03202154)
(Florida Notary No. GG154748)
16062 South West 34 Court Road
Ocala, Florida, 34473

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via email and US Mail to;

Republican National Committee
310 First Street, SE,
Washington, DC, 20003

Department of State
Division of Elections
Room 316, R.A. Gray Building
500 South Bronough Street
Tallahassee, FL 32399-0250
DivElections@dos.myflorida.com
850-245-6200

Republican Party of Florida
420 E. Jefferson Street
Tallahassee, FL 32301
850-222-7920

Fox News Network, LLC
1211 Avenue Of The Americas
New York, NY 10036
212-301-3000

On this the 27th day of June, 2018

/s/Christopher Edward Hallett
CHRISTOPHER EDWARD HALLETT, ESQ