

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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NORTHERN DISTRICT OF OHIO

1:04CV2147

JUDGE MATIA

CITIZENS ALLIANCE FOR)
SECURE ELECTIONS, et al.,)
Plaintiffs,)

-vs-)

MICHAEL VU, et al.,)
Defendants.)

PLAINTIFFS' MOTION
FOR TEMPORARY
RESTRAINING ORDER

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, plaintiffs, by and through counsel, moves the Court for an Order temporarily restraining the defendants, their agents, employees and all persons acting independently or in concert with them to:

1. To order the Defendants to correct errors made when data was transcribed from registration applications to the County's official voting list, for the persons to be identified from evidence to be presented.
2. To order the Defendants to add persons whose applications were timely submitted as registered voters, but whose applications were never processed by the Board, for the persons to be identified from evidence to be presented.
3. To appoint a Special Master, at Defendants' expense, to review the so-called Fatal Pending List, to add names to the official voting list upon presentation of reasonably accurate proof that their names have been omitted from the official voting list either because of transcription errors (see Par. 1, above) or processing errors (see par. 2 above).

4. To take steps reasonably calculated to notify persons on the Fatal Pending List of the need to cure errors and omissions in the transcription and processing of their registration applications, for inclusion on the official voting list on or before November 2, 2004.

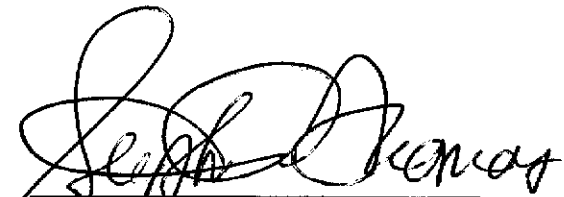
This motion is made for good cause and for the additional reasons as set forth in the verified complaint, the accompanying memorandum in support and supporting exhibits to the verified complaint and memorandum in support of this motion.



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