

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA)

Plaintiff,)

v.)

CIVIL ACTION NO. 4:05-cv-33 (TSL/AGN)

IKE BROWN, individually, and in his)
official capacities as Chairman of Noxubee)
County Democratic Executive Committee)
and Superintendent of Democratic Primary)
Elections; NOXUBEE COUNTY)
DEMOCRATIC EXECUTIVE)
COMMITTEE; CARL MICKENS,)
individually, and in his official capacities)
as the Circuit Clerk of Noxubee County,)
Superintendent of Elections, Administrator)
of absentee ballots and Registrar of voters;)
the NOXUBEE COUNTY ELECTION)
COMMISSION; NOXUBEE COUNTY,)
MISSISSIPPI; and those acting in concert,)

Defendants.)
_____)

**UNITED STATES' MOTION FOR AN INJUNCTION, *PENDENTE LITE*,
PROHIBITING DEFENDANTS IKE BROWN AND THE NOXUBEE COUNTY
DEMOCRATIC EXECUTIVE COMMITTEE FROM HARASSING, THREATENING,
OR INTIMIDATING PLAINTIFF'S WITNESSES**

Plaintiff United States of America moves, pursuant to the inherent powers of this Court,
and in reliance upon its memorandum in support of this Motion, for an injunction *pendente lite*,
prohibiting the Defendants Ike Brown and the Noxubee County Democratic Executive
Committee, and those acting on their behalf or in concert with them, including Terry Grasseree,

from harassing, threatening, or intimidating persons identified by the United States to be possible witnesses in this case, including those persons who were identified in the United States' Rule 26(a) disclosures, or any other person who is believed to have information in any way related to the matters at issue in this case.

Respectfully submitted,

BRADLEY J. SCHLOZMAN
Acting Assistant Attorney General
Civil Rights Division

DUNN O. LAMPTON
United States Attorney,
Southern District of
Mississippi

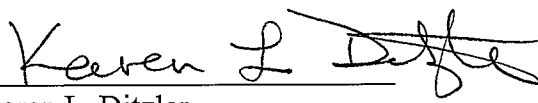
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CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2005, I filed the foregoing using the ECF system, which sent notification of such filing to Wilbur O. Colom, Esq. of the Colom Law Firm, LLC 200 6th Street North, Suite 102, Columbus, Mississippi 39701; Ellis Turnage, Esq. P.O. Box 216, 108 North Pearman, Cleveland, Mississippi 38732; and Christopher D. Hemphill, Esq., Webb, Dunn, and Hemphill, P.A., 214 5th Street South, Columbus, Mississippi 39701.



Karen L. Ditzler