

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

FAIR FIGHT, INC., JOHN DOE, and
JANE DOE,

Plaintiffs,

v.

TRUE THE VOTE, CATHERINE
ENGELBRECHT, DEREK
SOMERVILLE, MARK DAVIS, MARK
WILLIAMS, RON JOHNSON, JAMES
COOPER, and JOHN DOES 1-10,

Defendants.

Case No. 2:20-cv-00302-SCJ

**PLAINTIFFS' MOTION
FOR A TEMPORARY
RESTRAINING ORDER
AND/OR
PRELIMINARY
INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Fair Fight Inc., John Doe, and Jane Doe, by and through the undersigned attorneys, file this Motion to for a Temporary Restraining Order and/or Preliminary Injunction to prohibit Defendants from continuing to file baseless challenges against lawful Georgia voters in advance of the January 5, 2021 runoff election. In particular, Plaintiffs seek an order restraining Defendants, their respective agents, officers, employees, and successors, and all persons acting in concert with each or any of them from:

- Submitting, or causing the submission of, further challenges to any voter's eligibility in the State of Georgia;
- Participating in any poll-watching, poll-monitoring, or election-observing activities; recruiting and training individuals for these activities; or advertising these activities; and
- Photographing or video recording voters or election workers during the course of voting or working at the polls.

Pursuant to Rule 65(d), Plaintiffs have filed with this Motion a proposed order directed at the persons to be bound thereby, stating the reasons why the order should issue, stating the order's terms specifically, and describing the acts restrained and required.

Pursuant to Rule 7.1A of the Local Rules of the Northern District of Georgia, Plaintiffs have also filed with their motion a brief citing the legal authorities supporting the motion and the facts relied upon.

Dated this 29th day of December, 2020.

Respectfully Submitted,

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**Pro hac vice motion forthcoming*

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CERTIFICATE OF SERVICE

I hereby certify that, on December 29, 2020, I served the foregoing
**Plaintiffs' Motion for a TRO and/or Preliminary Injunction and
Memorandum in Support and Proposed Order** (along with the Court's Orders
entered December 28 and 29, 2020) as follows:

Service on True the Vote and Catherine Englebrecht

By FedEx to:

True the Vote and Catherine Englebrecht
7232 Wynnwood Lane
Houston, TX 77008-6041

And by Email to:

Catherine@truethevote.org and
gaelectorchallenge@truethevote.org.

And by FedEx and Email to:

Jim Bopp
The Bopp Law Firm PC
The National Building
1 South Sixth Street
Terra Haute, Indiana 47807
jboppjr@aol.com

Ray Smith III
Smith & Liss LLC
Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328
rsmith@smithliss.com

And by **Hand-delivery to:**

Ray Smith III
Smith & Liss LLC
Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328

and to

Ray Smith III
850 Edgewater Trail
Atlanta, Georgia 30328

Service on Derek Somerville

By FedEx, Hand-delivery, and Email to:

Derek Somerville
5130 Saddlebred Lane
Cumming, Georgia 30028
Derek.somerville@spcbna.com

Service on James Cooper

By FedEx and Hand-delivery to:

James Cooper
694 Loth Wages Road
Dacula, Georgia 30019

Service on Mark Williams

By FedEx and Hand-delivery to:

Mark Williams
3312 Canary Trail
Duluth, Georgia 30096

Service on Mark Davis

By FedEx and Hand-delivery to:

Mark Davis
325 Wesfork Way
Suwanee, Georgia 30024

Service on Ron Johnson

By **FedEx and Hand-delivery to:**

Ron Johnson

1754 Tugalo Drive

Jefferson, Georgia 30549

This, the 29th day of December, 2020.

/s/ Allegra J. Lawrence

Allegra J. Lawrence