

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

CITIZENS FOR TRUMP,)
NORTHEAST OHIO COALITION)
FOR THE HOMELESS, and)
ORGANIZE OHIO,)
)
Plaintiffs,)
v.)
)
CITY OF CLEVELAND, and)
MAYOR FRANK G. JACKSON,)
in his official capacity,)
)
)
Defendants.)
)
)

Civil Action No.:

PLAINTIFFS' EMERGENCY MOTION TO EXPEDITE

For the reasons set forth below, Plaintiffs Citizens for Trump, the Northeast Ohio Coalition for the Homeless, and Organize Ohio respectfully move this Court for a modified briefing schedule to allow for expedited consideration of their Motion for Preliminary Injunction. Plaintiffs seek to expedite the resolution of their motion for the same reason they seek the injunctive relief: to prevent ongoing, severe First Amendment infractions by Defendants.

The Republican National Convention starts in less than 5 weeks, and Defendants have announced (and, in a letter of June 10, 2016, confirmed) a series of restrictions that will effectively bar Citizens for Trump and Organize Ohio from engaging in Constitutionally-protected speech during the Convention. As Plaintiffs' Motion and accompanying declarations illustrate, each and every day that passes makes it harder for these Plaintiffs to successfully and effectively host the events that the First Amendment entitles them to hold. For example, even though both of these Plaintiffs applied months ago for permits to have a parade, and Citizens for Trump applying also

for a rally, the City still has not informed them of whether or when such a parade or rally may take place. This continuing delay prevents the organizers from securing necessarily equipment, making travel arrangements, and getting word out about their events. Delay directly interferes with their Constitutional right to expressive activity in July.

Far from being prejudiced by this schedule, Defendants will also benefit from the prompt resolution of these issues. A Court ruling will give Defendants necessary guidance on their Constitutional obligations with sufficient time for the City to make appropriate adjustments.

For the foregoing reasons, Plaintiffs respectfully request this Court to order that:

1. Defendants file their Opposition to Plaintiffs' Motion for Preliminary Injunction on or before 5 pm on Wednesday, June 15, 2016; and
2. Plaintiffs will file any Reply Brief by 9 am the following morning, June 16, 2016.

This would allow the matter to be fully briefed in advance of June 17, which is just 4 weeks before the beginning of the RNC in Cleveland.

Dated: June 14, 2016

Respectfully submitted,

Respectfully Submitted,

s/ Freda J. Levenson

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion to Expedite was filed this 14th day of June, 2016 and served upon Defendants by courier, e-mail, and certified U.S. mail, return receipt requested, at the following address:

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s/ Freda J. Levenson
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