

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

<b>CITIZENS FOR TRUMP,</b>	)	
	)	
<b>NORTHEAST OHIO COALITION FOR THE HOMELESS, and</b>	)	
	)	
<b>ORGANIZE OHIO,</b>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CIVIL ACTION NO. 1:16-cv-1465
	)	
<b>CITY OF CLEVELAND et al.,</b>	)	JUDGE JAMES S. GWIN
	)	
Defendant.	)	
	)	

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**MOTION TO MODIFY BRIEFING SCHEDULE**

Plaintiffs respectfully move this honorable Court to modify the briefing schedule on Plaintiffs’ Motion for Preliminary Injunction ordered on June 14, 2016. In its order, the Court required Defendants to respond to their Motion by June 20, 2016, and Plaintiffs to file any reply by June 23, 2016. In support of this Motion to Modify the Schedule, Plaintiffs state as follows:

1. Plaintiffs are not requesting that the time that this Court ordered for Defendants to respond be altered.
2. However, Plaintiffs respectfully suggest that they would file their reply by June 21 or June 22, 2016 – instead of June 23 - if by doing so would allow a hearing on their Preliminary Injunction Motion to be scheduled for June 22.
3. Plaintiffs are in urgent need of emergency relief and would be willing to shorten their time to prepare their reply if this would mean that their Motion could be resolved more quickly.

4. Every day that goes by erodes the size, scope, and effectiveness of the First Amendment activity that Plaintiffs may eventually permitted to conduct at the rapidly approaching RNC.
5. The City's delay is now exacerbated by the facts that:
  - (a) Although the City has begun to issue park permits to (on information and belief) *all other* park permit applicants, including applicants who applied significantly later than Citizens for Trump, Citizens for Trump has not been issued any grant, denial, or other disposition of its park permit application, and remains completely in the dark about whether the City is even processing its application. The City's decision to depart from its announced policy of first-come, first served, and instead allocate the artificially-scarce time slots on the basis of unknown criteria underscores the need for prompt judicial intervention to provide clarity to all applicants, and
  - (b) No parade permits have been issued.

Respectfully submitted,

/s/ Freda J. Levenson

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**Certificate of Service**

On June 16, 2016, true copy of this Motion was filed and served upon the following using  
the Court's Electronic Filing System:

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