

**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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**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