IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF FLORIDA TALLAHASSEE DIVISION

ANDREW H. WARREN,

Plaintiff,

Civil Action No.

v.

RON DESANTIS, individually and in his official capacity as Governor of the State of Florida,

Defendant.

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

For the reasons set forth in this Motion and the attached memorandum, Plaintiff Andrew H. Warren moves the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure and Local Rule 7.1 for a preliminary injunction (1) ordering Defendant Governor Ron DeSantis to rescind his Executive Order Number 22-176 suspending Warren from his duly elected office as State Attorney for the 13th Judicial Circuit, (2) ordering DeSantis to reinstate Warren as State Attorney for the 13th Judicial Circuit, and (3) enjoining DeSantis from issuing any further order or taking any other action against Warren in retaliation for Warren's constitutionally protected speech or in excess of the powers granted DeSantis under the Florida Constitution.

This Motion is supported by the attached memorandum of points and authorities; the verified Complaint in this action, along with Exhibits 1 through 4 to the Complaint; the Declaration of David Singer and Exhibits 1 through 14 thereto, which are being filed contemporaneously with this Motion; and the Declaration of Andrew Warren, which is also being filed contemporaneously with this Motion.

ORAL ARGUMENT

Pursuant to Local Rule 7.1(K), Plaintiff requests oral argument, estimating that 90 minutes is required.

Dated: August 17, 2022

By: <u>/s/ David B. Singer</u> David B. Singer Florida Bar No. 72823 Matthew T. Newton Florida Bar No. 111679 101 E. Kennedy Blvd., Suite 2800 Tampa, FL 33602 dsinger@shumaker.com mnewton@shumaker.com

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**Pro Hac Vice* pending

ATTORNEYS FOR PLAINTIFF