

3. Plaintiffs' counsel have been in regular contact with attorneys for the City of Dallas attempting during that time to resolve the disputes now brought before this Court. Plaintiffs' counsel has advised the foregoing attorneys that this motion is being presented today.

4. Plaintiffs hereby respectfully request an immediate status conference to discuss a schedule for limited, expedited discovery and a hearing on this motion at the court's earliest opportunity.

WHEREFORE, Plaintiffs respectfully request that this Court issue a TRO/preliminary injunction enjoining the Defendant City of Dallas, and its officials, employees, agents, assigns and others who may be acting in concert with them, from unreasonably interfering with Plaintiffs' rights to free expression in public forums within the City of Dallas, and more specifically order Defendants to:

Withdraw any requirement that Plaintiffs' purchase insurance to cover their exercise of their First Amendment rights;

[SIGNATURE PAGE & CERTIFICATE OF SERVICE FOLLOWS]

Respectfully submitted,

By: 

Jonathan F. Winocour
State Bar No. 24037730
David P. Ray III
State Bar No. 24027766
WINOCOUR | RAY
9400 N. Central Expressway, Suite 1204
Dallas, Texas 75231
(214) 575-6060 Telephone
(214) 575-6220 Facsimile
jwinocour@winocour-ray.com
dray@winocour-ray.com

By: 

Corinna Chandler
Texas Bar No. 24061272
Chandler Martinez, L.L.P.
6611 Hillcrest Avenue, Box # 542
Dallas, Texas 75205
(214) 758-0354 Telephone
(214) 758-0362 Facsimile
chandler@chandlermartinez.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document and the accompanying appendix were served on the City Attorney for the City of Dallas via hand delivery on this Wednesday, October 12, 2011.

By: 

Jonathan F. Winocour