

1 TRO
2 **MITCHELL S. BISSON, ESQ.**
3 Nevada Bar No. 11920

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9 **EIGHTH JUDICIAL DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 CLARK COUNTY REPUBLICAN
12 CENTRAL COMMITTEE, a Nevada non-
13 profit corporation;

Case: A-21-839422-C

14 Plaintiff,

Dept: 8

15 v.

16 JESSE LAW, individually; MICHAEL
17 STEIGMEN, individually; SALLY
18 MINSTER, individually; CHRISTINE
19 DECORTE, individually; PATRICK
20 CASALE, individually; STEVEN ESH,
21 individually; NATALIE ROACH,
22 individually; CHRISTOPHER DYER,
23 individually; CHRISTOPHER HISGEN,
24 individually; DOES I-X; and ROE
25 BUSINESS ENTITIES I-X, inclusive,

26 Defendants.

27 **TEMPORARY RESTRAINING ORDER**

28 Upon the Application and attached exhibits of Plaintiff herein, and upon the Verified Complaint in this matter, the Court finds grounds supporting the temporary issuance of a restraining order that it appears from the specific facts stated below that Plaintiff will suffer immediate and irreparable injury, loss, or damage before the adverse party or his attorney can be heard in opposition thereto.

THE COURT FINDS that pursuant to Nevada Rules of Procedure (NRCPP) 65(b) that immediate and irreparable injury, loss, or damage may result to Plaintiff before the adverse party can be heard in this matter.

THE COURT FURTHER FINDS that the Plaintiff enjoys a reasonable likelihood of success on the merits because Plaintiff has shown sufficient evidence to support their causes of action as outlined above. Specifically, the exhibits and authorities provided by Plaintiff show a

1 reasonable likelihood that the alleged July 28, 2021 meeting of the CCRCC was improperly set and
2 improperly noticed by general members of the CCRCC and not by the Officers or Executive Board.

3 **THE COURT FURTHER FINDS** that despite the July 28, 2021 meeting being improperly
4 set and noticed, Defendants are taking actions as if they were properly elected on such date and are
5 representing themselves out as being officers and/or members of the executive board.

6 **THE COURT FURTHER FINDS** that the July 28, 2021 meeting violated the CCRCC by-
7 laws, standing rules, and Nevada law in that it was held upon a mere four (4) days notice.

8 **THE COURT FURTHER FINDS** that Defendants' actions, if not *immediately* stopped,
9 will cause immediate and irreparable injury to Plaintiff and the public in general by causing mass
10 confusion as to the proper leadership of the CCRC. Furthermore, Defendants' are actively
11 representing themselves out as being in such leadership roles and have demanded Plaintiff turn over
12 accounts, financial information, and membership records. If Defendants are not stopped, Plaintiff
13 will suffer irreparable injury by the turn-over of such documentation. ~~Likewise, Defendants' acts~~
14 ~~of holding fundraisers on behalf of the CCRCC under the guise of Defendants being in such~~
15 ~~leadership roles will cause further irreparable harm to Plaintiff and the general public.~~

16 **THE COURT FURTHER FINDS** that issuance of the instant Temporary Restraining
17 Order without prior notice to the Defendants is proper based upon the urgent nature of the dispute,
18 the upcoming fundraisers set up by Defendants allegedly on behalf of the CCRCC, and the
19 upcoming *properly-noticed* Regular Meeting of the CCRCC on August 17, 2021.

20 **THE COURT FURTHER FINDS** that an order *prohibiting* Defendants from the
21 following conduct is necessary, proper, and in the best interest of the public:

- 22 1. Holding themselves out as or representing themselves as Officers of the CCRCC and/or
23 members of the CCRCC Executive Board and/or members of the Board of Trustees;
- 24 2. Interfering with the upcoming properly-noticed CCRCC Regular Meeting set for
25 August 17, 2021; and
- 26 ~~3. Holding any fundraisers or accepting any funds on behalf of the CCRCC.~~

27 **THEREFORE, IT IS HEREBY ORDERED AND DECREED** that until such time as the
28 parties return before this Court for a hearing on the issuance of a Preliminary Injunction, and that
until such time, the named Defendants are **PROHIBITED AND ENJOINED** from:

**As the Court is closed and the Hearing will be held on Monday August 16th, 2021 no Bond is required. If the Hearing is continued Bond in the amount of \$500.00 will be required

1. Holding themselves out as or representing themselves as Officers of the CCRCC and/or members of the CCRCC Executive Board and/or members of the Board of Trustees;
- ~~2. Interfering with the upcoming properly noticed CCRCC Regular Meeting set for August 17, 2021; and~~
3. Holding any fundraisers or accepting any funds on behalf of the CCRCC.

IT IS HEREBY FURTHER ORDERED AND DECREED, that the Motion for Preliminary Injunction will be held on the 16th day of August, 2020 at the hour of 1:00 pm a.m. / p.m. in Department 8.

IT IS HEREBY FURTHER ORDERED AND DECREED that the instant Restraining Order, and all pleadings, affidavits and briefs in support of the restraining order and the motion for preliminary injunction must be served upon the adverse party no later than August 16th, 2021 and the Defendants have until August 16th, 2021 to file oppositions, counter-affidavits and briefs.

ITS IS HEREBY FURTHER ORDERED AND DECREED, THAT A BOND BE SET IN THE AMOUNT OF \$ ** See above.

IT IS HEREBY FURTHER ORDERED AND DECREED that Plaintiff's Application for a Temporary Restraining Order is granted on or about this 13th day of August, 2021 at 4:56: am / pm.
Dated this 13th day of August, 2021

DATED this _____ day of August, 2021.



268 D41 DB18 3849
Jessica K. Peterson
District Court Judge
DISTRICT COURT JUDGE

As the fundraiser is being held on behalf of the Plaintiff Court does not find that there would be irreparable harm to Plaintiff as an organization in holding the fundraiser, but enjoins the individuals who claim that they are the newly elected Board from stating as much to any individual until such time as the parties can be heard by the Court. Any and all funds collected at the fundraiser shall be accounted for and held separately. The regularly scheduled meeting of August 17th shall be stayed until such time as both parties can be heard by the Court.

Respectfully submitted,
LAW OFFICES OF MITCHELL S. BISSON, ESQ.

By: /s/ Mitchell S. Bisson, Esq.
MITCHELL S. BISSON, ESQ.
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Attorney for Plaintiff

1 **CSERV**

2
3 DISTRICT COURT
CLARK COUNTY, NEVADA

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5
6 Clark County Republican Central | CASE NO: A-21-839422-C
Committee, Plaintiff(s)
7 |
vs. | DEPT. NO. Department 8
8 |
9 Jesse Law, Defendant(s)

10
11 **AUTOMATED CERTIFICATE OF SERVICE**

12 This automated certificate of service was generated by the Eighth Judicial District
13 Court. The foregoing Temporary Restraining Order was served via the court's electronic
14 eFile system to all recipients registered for e-Service on the above entitled case as listed
below:

15 Service Date: 8/13/2021

16 Mitchell Bisson mbisson@bissonlegal.com

17 Matthew Hughes Hughes@BissonLegal.com

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