IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PENNSYLVANIA DEMOCRATIC PARTY, Plaintiff, -versus- REPUBLICAN PARTY OF PENNSYLVANIA, DONALD J. TRUMP FOR PRESIDENT, INC., ROGER J. STONE, JR., and STOP THE STEAL, INC, Defendants.	Civil Action No. 2:16-cv-05664

DEFENDANT REPUBLICAN PARTY OF PENNSYLVANIA RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

The Republican Party of Pennsylvania ("RPP") opposes Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction for the following reasons:

1) The claims asserted in Plaintiff's Motion are baseless, unsubstantiated conspiracy-theory notions of alleged organized mythical voter intimidation tactics, which are false, recklessly and improperly made, and, therefore, denied by the RPP;

2) Plaintiff cannot under any circumstance meet the standards necessary to warrant the grant of injunctive relief, which is an extraordinary remedy that should be granted only in limited circumstances;

3) Plaintiff has unreasonably delayed filing its Motion until 10 days before the General Election;

4) Plaintiff's claims are not presented for a proper purpose, nor are they warranted by existing law, but rather such claims are intended for the sole purpose of furthering its political objectives on the eve of a national election;

5) Plaintiff's claims are intended and designed to harass the Defendant RPP, so as to deny their constitutional rights to conduct their legitimate campaign activities;

6) Plaintiff's frivolous claims fail to state a cognizable claim upon which relief can be granted;

7) Plaintiff requests the Court to grant an injunction that is not necessary and is improper;

The RPP has filed a Brief setting forth their position, and they incorporate that filing by reference herein. The RPP reserves the right to advance additional arguments based upon the evidence elicited at the Hearing on November 7, 2016.

WHEREFORE, the Republican Party of Pennsylvania respectfully requests this Honorable Court to deny Plaintiff's Motion.

Respectfully submitted,

/s/ Rebecca L. Warren
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CERTIFICATE OF SERVICE

I certify that on this date I electronically filed the foregoing Response using the Court's electronic filing system, making it available for download to counsel of record as indicated below:

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I certify that on this date I sent the foregoing Response to all parties without counsel of record via overnight mail and to the listed email address on the Stop the Steal, Inc. website.

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November 4, 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

PENNSYLVANIA DEMOCRATIC PARTY, Plaintiff, -versus- REPUBLICAN PARTY OF PENNSYLVANIA, DONALD J. TRUMP FOR PRESIDENT, INC., ROGER J. STONE, JR., and STOP THE STEAL, INC, Defendants.	Civil Action No. 2:16-cv-05664-PD

ORDER

AND NOW, this day of , 2016, upon consideration of the Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction, and the response of the Republican Party of Pennsylvania, it is hereby ORDERED that Plaintiff's Motion is DENIED.

BY THE COURT:

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Paul S. DIAMOND, J.