

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

**ERIC O'KEEFE, and
WISCONSIN CLUB FOR GROWTH,
INC.,**

Plaintiffs,

v.

**FRANCIS SCHMITZ, in his official and
personal capacities,
JOHN CHISHOLM, in his official and
personal capacities,
BRUCE LANDGRAF, in his official and
personal capacities,
DAVID ROBLES, in his official and
personal capacities,
DEAN NICKEL, in his official and personal
capacities, and
GREGORY PETERSON, in his official
capacity,**

Defendants.

Civil Case No. _____

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Eric O'Keefe and Wisconsin Club for Growth ("Plaintiffs"), through their counsel, respectfully move this Court pursuant to Fed. R. Civ. P. 65(a) to enter an order enjoining Defendants Chisholm, Landgraf, Robles, and Nickel ("Defendants") from continuing to conduct a wide-ranging "John Doe" investigation on that grounds that it has the purpose and effect of retaliating against and otherwise preventing and discouraging Plaintiffs' exercise of free speech and association in violation of the First and Fourteenth Amendments, which are enforceable against Defendants through 42 U.S.C. § 1983.

In support of this Motion, Plaintiffs submit a Memorandum in Support of Plaintiffs' Motion for a Preliminary Injunction and Declarations and Exhibits thereto, which are hereby incorporated within this Motion by reference.

Dated: February 10, 2014

Respectfully submitted,

/s/ David B. Rivkin

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* Admission to the Eastern District of Wisconsin pending