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FILED
 CLERK OF DISTRICT COURT
 CENTRAL DISTRICT OF CALIF.
 11 SEP 29 AM 11:55

12 Attorneys for Plaintiff
 13 COURTHOUSE NEWS SERVICE

14 UNITED STATES DISTRICT COURT
 15 CENTRAL DISTRICT OF CALIFORNIA

16 **CV11-08083 R(MAN)**
 17 CASE NO.

18 Courthouse News Service,

19 Plaintiff,

20 v.

21 Michael D. Planet, in his official capacity
 22 as Court Executive Officer/Clerk of the
 23 Ventura County Superior Court.

24 Defendants.

25 **NOTICE OF MOTION AND
 26 MOTION FOR PRELIMINARY
 27 INJUNCTION**

28 Date: Nov. 7, 2011
 Time: 10:00 am
 Courtroom: _____
 Judge: _____

Documents filed herewith:

- 1) Memorandum of Points and Authorities
- 2) Declaration of William Girdner
- 3) Declaration of Christopher Marshall
- 4) Declaration of Julianna Krolak
- 5) Declaration of Karen Covel

1 **TO THE COURT, THE PARTIES AND ALL COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on November 7, 2011, at 10:00 a.m., in
3 Courtroom ____ of the United States District Court for the Central District of
4 California, _____ Division, at _____,
5 Plaintiff Courthouse News Service will and does move this court for a preliminary
6 injunction against Defendant Michael Planet, in his official capacity as Court
7 Executive Officer/Clerk of the Ventura County Superior Court, together with his
8 agents, assistants, successors, employees, and all persons acting in concert or
9 cooperation with them, or at his direction or under his control, prohibiting him
10 preliminarily, during the pendency of this action, from enforcing his policy of denying
11 Courthouse News Service access to new unlimited jurisdiction civil complaints filed
12 at the Ventura County Superior Court until after the "requisite processing" has been
13 completed, and further directed to provide Courthouse News Service with access to
14 new complaints no later than the end of the day on which they are filed, except in
15 those instances where the filing party is seeking a TRO or other immediate relief or
16 has properly filed the pleading under seal.

17 The motion is based on the complaint, the memorandum of points and
18 authorities, the declarations of William Girdner, Christopher Marshall, Julianna
19 Krolak, and Karen Covell, each filed herewith, any opposition papers and evidence
20 filed by Defendant, Plaintiff's reply papers and evidence submitted therewith, and any
21 argument or evidence presented at hearing, or as otherwise permitted by the Court.

22 Date: September 29, 2011

HOLME ROBERTS & OWEN LLP
RACHEL MATTEO-BOEHM
DAVID GREENE
LEILA KNOX

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25
26 By: 

Rachel Matteo-Boehm
Attorneys for Plaintiff
COURTHOUSE NEWS SERVICE