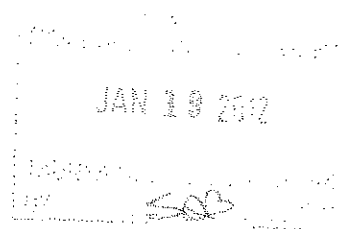


COMMONWEALTH OF KENTUCKY
CAMPBELL COUNTY CIRCUIT COURT
1st DIVISION
CASE NO. 12-CI-89



CHARLIE COLEMAN, JOHN P. ROTH JR AND ERIK HERMES,
ON BEHALF OF THEMSELVES AND OTHERS
SIMILARLY SITUATED

PLAINTIFFS

V.

CAMPBELL COUNTY PUBLIC LIBRARY
BOARD OF TRUSTEES

DEFENDANT

PLAINTIFFS' MOTION FOR AN ORDER TO REQUIRING THE CAMPBELL
COUNTY LIBRARY BOARD OF TRUSTEES TO ESCROW ALL TAX PAYMENTS
RECEIVED IN EXCESS OF \$0.30 PER THOUSAND OF ASSESSED VALUE

Comes now the Plaintiffs, by and through counsel, and moves this Court for an Order requiring the Defendant Library to escrow all taxes collected in excess of \$0.30 per thousand of value. In support the Verified Complaint signed by the Plaintiffs is incorporated by reference herein. The issue is straightforward, KRS 173.790 requires a petition to increase and/or decrease the Defendant's tax rate. Nonetheless, the Defendant has refused to follow the applicable law. The Plaintiffs are able to show a likelihood of success on the merits and will suffer irreparable harm in that tax money unlawfully collected will be paid out with the possibility it is unable to be returned, especially since the Defendant Library's own budget shows expenditures in well excess of the taxes authorized by KRS 173.790.

Wherefore, Plaintiff would ask that this Motion be granted.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "B. Voelker", written over a horizontal line.

Brandon N. Voelker
The Voelker Firm, PLLC

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Cold Spring, Kentucky 41076
(859) 781-9100
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NOTICE

3rd The foregoing Motion shall come for a hearing before the Campbell Circuit Court on the
day of January, 2012 at *9:30* am or as soon thereafter as Counsel may be heard.
February

CERTIFICATION

I hereby certify that true accurate copy of the foregoing was been served simultaneously
with the Complaint filed herein to the following:

Robert Jennings/Agent
3 Whispering Woods Lane
Alexandria, Kentucky 41001

On this 19th day of January 2012.



Brandon N. Voelker