

IN THE CIRCUIT COURT FOR  
LEON COUNTY, FLORIDA  
CIVIL DIVISION

ALBERT A. GORE,  
Nominee of the Democratic Party  
for President of the United States,

Plaintiff,

v.

ELECTIONS CANVASSING COMMISSION  
OF FLORIDA and FLORIDA SECRETARY  
OF STATE KATHERINE HARRIS,

Defendants.

CASE NO.: 00-2717

DAVE LANG  
CLERK CIRCUIT COURT  
LEON COUNTY, FLORIDA

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FILED

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PLAINTIFF'S MOTION FOR TEMPORARY AND PERMANENT INJUNCTION

The Plaintiff, Albert A. Gore, Nominee of the Democratic Party for President of the United States, moves the court pursuant to Florida Rule of Procedures 1.610 to temporarily enjoin the Defendants from certifying the statewide results of the presidential election conducted November 7, 2000. In support of this motion Plaintiff shows:

1. The allegations of the complaint are re-alleged and adopted by reference.
2. On November 13, 2000 Plaintiff's counsel informed the Defendant's counsel and counsel for George W. Bush, Nominee of the Republican Party for President of the United States, of the intent to file this action and to seek relief in an immediate hearing. Plaintiff has also been granted leave to intervene in *McDermott v. Katherine Harris*, Leon County Circuit Court Case No. 00-2700, a case that presents issues similar to the issues of this proceeding.


3. The Plaintiff will suffer irreparable harm if the Statewide Canvassing Board's tabulation of the votes cast in the State of Florida for President of the United States does not include the final vote tally from overseas absentee voters and voters in those counties that have elected as permitted and required by the laws of the State of Florida to conduct manual recounts of their votes. That injury will include having votes of citizens lawfully cast for him not being counted in the closest Presidential race since 1960 and one of the closest ever.

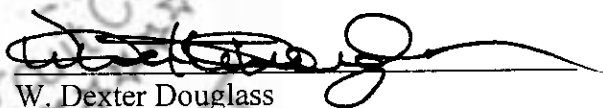
4. The public interest in having a full, fair, complete recount as provided through the laws of the State of Florida is immense. If the Defendants fulfill their announced intent the public interest will be grievously injured.

5. The likelihood of Plaintiff succeeding on the merits is great.

WHEREFORE, the Plaintiff, Al Gore, moves this court to enter a temporary injunction forbidding the Defendants from certifying the state wide results of the 2000 Presidential election until such time as it receives the certified results of all county canvassing boards, including those conducting manual recounts and the results of all absentee ballots, or until November 18, 2000 whichever shall come first.

Respectfully submitted this 13<sup>th</sup> day of November, 2000.

  
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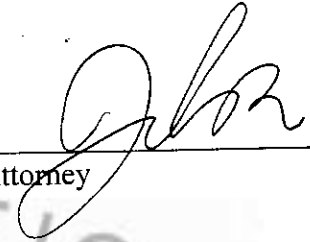
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that an original of foregoing has been furnished by hand delivery to the following on this 13<sup>th</sup> day of November, 2000:

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