

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION**

**MICHELLE SOLOMON,** )  
**GRADY ROSE, ALLISON SPENCER,** )  
**SAVANNAH KITE,** )

**Plaintiffs,** )

**vs.** )

**Case Number:**

**THE MAYOR and** )  
**ALDERMAN OF THE CITY OF** )  
**SAVANNAH,** )

**Defendant.** )

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**PLAINTIFFS’ MOTION FOR TEMPORARY RESTRAINING ORDER**

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Come Now, the Plaintiffs by and through their undersigned counsel and hereby files this their Motion for Temporary Restraining Order against the Defendant, and shows this Honorable Court the following as follows:

On March 14, the City of Savannah imposed an absolute ban on all hand-held poster signs that might be displayed along the parade route during the annual Savannah St. Patrick’s Day Parade, while allowing attendees to display hand-held American flags and other flags. As detailed in the accompanying memorandum of law, this ban violates the First Amendment because it is content-based, essentially favoring displayed messages honoring the American flag. But even if it is content-neutral, the ban violates the First Amendment because it is not narrowly tailored to achieve a significant government interest. It is utterly unclear what security interests are served by banning hand-held poster signs when hand-held flags are permitted.

Accordingly, Plaintiffs move for a temporary restraining order enjoining Defendant the City of Savannah from enforcing the ban on hand-held poster signs (no larger than a poster board) in tomorrow's Savannah St. Patrick's Day parade.

Respectfully submitted, this 16<sup>th</sup> day of March, 2018.

THE CLAIBORNE FIRM, P.C.

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*Application for admission into S.D.Ga.  
and/or pro hac vice pending*

**ATTORNEYS FOR PLAINTFFS**