

IN THE SUPREME COURT

Action No. _____

Travis Broadhurst;)
PLAINTIFF.)
)
Versus)
)
Paul Kushner,)
 Chair, Board of Elections;)
Andy Hoang,)
 Member, Board of Elections;)
Arunabha Debnath,)
 Member, Board of Elections;)
Joanna Zhang,)
 Member, Board of Elections;)
Zaid Khatib,)
 Member, Board of Elections;)
Zach Johnson,)
 Member, Board of Elections;)
Lucy Best,)
 Member, Board of Elections;)
)
DEFENDANTS.)

MOTION FOR INJUNCTION

Allegation of the Grounds for the Order Sought

III S.G.C. §631(A) gives the Student Supreme Court the power to “issue temporary injunctions against the Board of Elections stopping an election... to preserve the status quo until a judicial determination can be reached.” Mr. Broadhurst’s complaint that he filed against the Board of Elections alleges that Elizabeth Adkins and Maurice Grier should not have been certified as candidates for Student Body President. If the Board of Elections properly revokes their certification and returns them to the status of Declared Candidate, Ms. Adkins and Mr. Grier will have gained an unfair advantage through their ability to campaign as Certified Candidates (VI S.G.C. §405(A)) for a period of no less than 72 hours. This advantage is compounded by the fact that the Spring General Election is scheduled to be conducted on Thursday, March 2nd, so by the time the Student Supreme Court rules on Mr. Broadhurst’s complaint and the Board of Elections returns Ms. Adkins and Mr. Grier to the status of Declared Candidate, Mr. Broadhurst will not have sufficient time to campaign or catch up to Ms. Adkins and Mr. Grier in a write-in campaign. Therefore, these circumstances are “extreme,” and this injunction is “necessary” for the Spring General Election to carry out its codified duty to “conduct *fair* and impartial student elections” (I S.G.C. §900, emphasis added).

Order Sought

The Plaintiff, Travis Broadhurst, requests that the Student Supreme Court issue a temporary injunction against the Board of Elections, pursuant to III S.G.C. §631(A), halting the Spring General Election for the office of Student Body President.

I do affirm that I have read in full the foregoing brief and that the allegations contained therein are true to the best of my knowledge and belief.

Travis Broadhurst

Travis Broadhurst
PLAINTIFF

[REDACTED]

betravis@live.unc.edu

[REDACTED]

Benjamin Albert

Benjamin Albert
COUNSEL FOR PLAINTIFF

[REDACTED]

btalbert@live.unc.edu

[REDACTED]

Filed this 28th day of February, 2017, at 4:50pm EST.