Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

Case # ________(B.A.H.)

Sharon Bridgewater

Claimant

Vs.

Donald Trump in his official capacity as
United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Defendant

MOTION FOR STAY OF PROCEEDINGS UNTIL COURT ORDER OBEYED, MOTION FOR ARREST FOR DISOBEYING COURT ORDERS, AND FAILING TO PERMIT DISCOVERY AND MOTION FOR DEFAULT

DATE: TBA

TIME: TBA

DEPARTMENT: Courtroom #6600
333 CONSTITUTION AVE N.W.
WASHINGTON D.C. 20001

TRIAL DATE: NONE SET

MOTION FOR FOR STAY OF PROCEEDINGS UNTIL COURT ORDER OBEYED, MOTION FOR ARREST FOR DISOBEYING COURT ORDERS, AND FAILING TO PERMIT DISCOVERY AND MOTION FOR DEFAULT

TO ALL PARTIES AND TO ATTORNEYS OF RECORD:

TAKE NOTICE that on Date: TBA, at Time: TBA, or as soon after that times as the matter can be heard, in Courtroom #6600 of the United States District Court for the District of Columbia located at 333 Constitution Ave. NW, Washington, DC 20001 the claimant moves this court to STAY PROCEEDINGS UNTIL COURT ORDER OBEYED, moves for arrest warrants for disobeying court orders, and failing to permit discovery and moves the court for Default attached as exh. A Proposed Order accompanies this motion.

I

GROUNDS FOR REQUESTED RELIEF

Claimant relies on the complaint filed conconcurrently.

MEMORANDUM AND POINTS OF AUTHORITIES

A party who knowingly, intentionally, willfully disobeys court order, and fail to permit discovery permit a Federal Judge to enter stay the proceeding and enter Default. Wherefore the Claimant moves for a stay of proceedings until the "court orders," are obeyed, issue arrest warrants for disobeying court orders, and failing to permit discovery and enter default.

2

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct.

Executed 2nd day of June 2017 in Detroit, Michigan

Sharon Bridgewater –Pro Se
Claimant
18952 Dale Street
Detroit, MI 48219
313-471-8714
Sbridge11@yahoo.com

(2)

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE: [redacted]

Motion for Stay of proceedings until court order obeyed

were sent by first class mail(in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

To: Jeff Sessions in his official capacity as
Attorney General of the United States
Department of Justice
950 Pennsylvania Ave, NW Washington DC 20530-0001
Certified mail#7015-1730-0000-4700-3936

To: The Clerk of the Court for the United States Federal District Court of Columbia
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail

To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

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To: Rex Tillerson in his official capacity as Secretary of State

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National Security Counsel
The White House
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To: RYAN MORAN IN HIS OFFICIAL
CAPACITY AS ROYAL OAK POLICE
OFFICER

ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE THE STATE OF MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.

.

Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Sharon Bridgewater
18592 Dale Street
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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

Case # _________(B.A.H.)

Sharon Bridgewater

Claimant

Vs.

Donald Trump in his official capacity as United States President

The White House
1600 Pennsylvania Avenue, N.W
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Defendant

AFFIDIVANT IN SUPPORT OF MOTION FOR STAY OF PROCEEDINGS UNTIL COURT ORDER OBEYED, MOTION FOR ARREST FOR DISOBEYING COURT ORDERS, AND FAILING TO PERMIT DISCOVERY AND MOTION FOR DEFAULT

DATE: TBA

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I being duly sworn dispose and says that:

1. That I am the Petitioner herein and if called to testify I can do so based upon first hand and/or personal knowledge.

2. That I am the Petitioner and/or affiant is competent to testify to the matters stated herein.

3. On or about March 1, 2017 and continuing thru present I have sent Donald Trump and/or Jeff Sessions complaints, demanding relief. They have refused to act. Even further "multiple person," and public officials were sent duly authorized subpeanas in several case(see the Claimant complaint filed concurrently). Two or more persons have violated court orders and continue to violate court orders, have failed to permit discovery. Wherefore this court must enter a default and futher issue arrest warrants.

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE: Affidavit in support of motion for Stay of proceeding

were sent by first class mail(in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

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44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
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ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.

Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

______________________________ **Case #** __________(B.A.H.)

	)
Sharon Bridgewater	)
	) **ORDER GRANTING MOTION TO STAY**
Claimant	) **OF PROCEEDINGS UNTIL COURT**
	) **ORDER OBEYED, MOTION FOR**
	) **ARREST FOR DISOBEYING COURT**
Vs.	) **ORDERS, AND FAILING TO PERMIT**
	) **DISCOVERY AND MOTION FOR**
	) **DEFAULT**

Donald Trump in his official capacity as
United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Defendant

.

ORDER GRANTING MOTION TO STAY OF PROCEEDINGS UNTIL COURT ORDER OBEYED, MOTION FOR ARREST FOR DISOBEYING COURT ORDERS, AND FAILING TO PERMIT DISCOVERY AND MOTION FOR DEFAULT

Having read and considered Sharon Bridgewater CLAIMANT motion THIS COURT GRANTS THE CLAIMANT MOTION.

THE COURT WILL ISSUE A SEPARATE ORDER.

DATE:___________

____

JUDGE BERYL A. HOWELL

2

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:
order granting motion to stay proceedings

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I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.

.

Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

CO 538
Rev. 2/2010

UNITED STATES DISTRICT AND BANKRUPTCY COURTS
FOR THE DISTRICT OF COLUMBIA

Sharon Bridgewater - Claimant
Plaintiff(s)

vs. Civil Action No. ______________ (B.A.H.)

Donald Trump in his official capacity as United States President
The White House
The White House Defendant(s)
1600 Pennsylvania Ave NW
Washington DC 20500 et al

AFFIDAVIT IN SUPPORT OF DEFAULT

I hereby certify under penalty of perjury, this 6th day of June, 2017, that I am the attorney of record for the plaintiff in the above-entitled case; that the defendant(s) Donald Trump in his official capacity as United States President - The White House 1600 Pennsylvania Ave. NW, Washington, DC 20050 et al was [were] (select one):

☐ personally served with process on ______________________.

☒ served via registered or certified mail pursuant to provisions of Rule 4(C)(ii) of the Superior Court of the District of Columbia on (date the return receipt was signed by addressee): March 28, 2017.

☐ served via First Class Mail pursuant to provisions of Rule 4(C)(ii) of the Federal Rules of Civil Procedure on (date the Acknowledgment Form was signed by addressee): ______________________.

☐ The authority for obtaining personal jurisdiction over the defendant served outside the District of Columbia is: ______________________.

I further certify under penalty of perjury that: no appearance has been entered by said defendant(s) in this case; no pleading has been filed and none served upon the attorney for the plaintiff(s); (select one)

☑ no extension has been given and the time for filing has expired

☐ although an extension has been given, the time for filing has expired;

and the defendant is neither an infant nor an incompetent person.

The Clerk is requested to enter a Default against said defendant(s).

____
Attorney for Plaintiff(s) [signature]

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714

______________________ ______________________
Bar Id. Number Name, Address and Telephone Number

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:
AFFIDIVANT IN SUPPORT OF DEFAULT

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Petitioner
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ATTORNEY FOR THE ABOVE

CO 547
Rev. 3/2010

UNITED STATES DISTRICT AND BANKRUPTCY COURTS
FOR THE DISTRICT OF COLUMBIA

Sharon Bridgewater - Claimant
Plaintiff(s) [redacted]

vs.

Civil Action No. (B.A.H.)
In re:
ADMIRALITY AND MARITIME CLAIM
(Defendant)

Donald Trump in his official capacity as United States President
Defendant(s) The White House
1600 Pennsylvania Ave NW
Washington D.C. 20500

MILITARY AFFIDAVIT

(Certificate in Compliance With Soldiers and Sailors
Civil Relief Act of 1940, As Amended in 1942 & 1960
Title 50, Appendix, Section 520, United States Code)

I hereby certify under penalty of perjury, this 6th day of June, 2017, that (select one):

☑ I am the duly authorized agent of the plaintiff in the above-listed case and make this certificate on plaintiff's behalf.

☑ I am the plaintiff in the above-entitled case.

I make this certificate pursuant to the provisions of the Soldiers and Sailors Civil Act of 1940 and the provisions of the Soldiers and Sailors Civil Relief Act Amendments of 1942 and 1960; that on behalf of the plaintiff, I have caused careful investigation to be made to ascertain whether or not the above-named defendant is in the military service of the United States or its Allies and that as a result of said investigation, I have discovered and do hereby allege that said defendant is not in the military service of the United States or its Allies, that is to say said defendant is not a member of the Army of the United States, the United States Navy, the Marine Corps, the Coast Guard and is not an officer of the public Health Service detailed by proper authority for duty either with the Army or Navy, and said defendant is not on active duty with any branches aforesaid, nor is said defendant under training or education under the supervision of the United States preliminary to induction in to the military services; and the defendant is not serving with the forces of any nation with which the United States is allied in the prosecution of any war, nor has said defendant been ordered to report for induction under the Selective Training and Service Act of 1940, as amended, nor is the defendant a member of the Enlisted Reserve Corps ordered to report for military service, but is employed as a "A public official".

Attorney for Plaintiff(s) [signature]

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
sbridge11@yahoo.com

Bar Id. Number

Name, Address and Telephone Number

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:
MILITARY AFFIDIVANT

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ATTORNEY FOR THE ABOVE

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

Sharon Bridgewater

CASE # [redacted] ______(B.A.H.)

[redacted]/Claimant)

) **AFFIDIVANT OF SERVICE**

)

Vs.)

)

Donald Trump in his official capacity as President

[redacted] THE WHITE House)

[redacted])

)

1600

[redacted]

[redacted] Pennsylvania Avenue, N.W.

Washington, D.C. [redacted]l et al

Defendant[redacted]e

AFFIDIVANT OF SERVICE

I being duly sworn dispose and says that:

I Sharon Bridgewater mailed the summons and/or complaint, hereby declare that on [redacted] MARCH 1, 2017

I mailed a copy of the summons and/or complaint, certified mail return receipt request to one or Donald Trump in his official capacity And Jeff Sessions No one has respondent, see next. page. Jeff Sessions And/or Donald Trump received the complaint the return receipt is on the next page.

[redacted]

[redacted] [redacted]

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits.	A. Signature X [signature] ☐ Agent ☐ Addressee B. Received by (Printed Name) MAR 28 2017 · C. Date of Delivery
1. Article Addressed to: Jeff Session's in his official capacity as Attorney General of the United States - Department of Justice 950 Pennsylvania Ave, N.W. Washington, D.C. 20530-0001	D. Is delivery address different from item 1? ☐ Yes If YES, enter delivery address below: ☐ No
9590 9402 2030 6123 6276 60 2. Article Number 7015 1520 0001 6915 4870	3. Service Type ☐ Adult Signature ☐ Adult Signature Restricted Delivery ☐ Certified Mail® ☐ Certified Mail Restricted Delivery Collect on Delivery Collect on Delivery Restricted Delivery ☐ Insured Mail ☐ Insured Mail Restricted Delivery (over $500) ☐ Priority Mail Express® ☐ Registered Mail™ ☐ Registered Mail Restricted Delivery ☐ Return Receipt for Merchandise ☐ Signature Confirmation™ ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053 Domestic Return Receipt

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed ~~27th~~ 31st DAY OF MARCH 2017 in Detroit, Michigan.

Date: March 31, 2017

Sharon Bridgewater –Pro Se
Plaintiff/Petitioner/Appellant/Claimant
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Sworn to and subscribed before me this 31st day of March, 2015

NOTARY PUBLIC or other person authorized to administer an oath

MY COMMISSION EXPIRES: 2/15/22

AMANDA HODGSON
Notary Public - Michigan
Oakland County
My Commission Expires Feb 15, 2022
Acting in the County of Wayne

See page 3

2

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:
Affidavit of mailing Sr

were sent by first class mail(in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

To: Jeff Sessions in his official capacity as
Attorney General of the United States
Department of Justice
950 Pennsylvania Ave, NW Washington DC 20530-0001
Certified mail#7015-1730-0000-4700-3936

To: The Clerk of the Court for the United States Federal District Court of Columbia
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail

To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail

To: Kerry W. Kircher, General Counsel D.C. Bar No. 386816 at U.S. House of Representatives
219 Cannon House Office Building Washington, DC 20515
Certified mail#7015-1730-0000-4700-3677

To: John Russell Tyler, General Counsel for Eric Holder at 950 Pennsylvania Ave, NW Washington DC 20530-0001 - Certified mail #7015-1730-0000-4700-3684

To: Donald B. Verrilli , the Solicitor General of the United States, Room 5614 – Department of Justice, 950 Pennsylvania Ave, NW Washington DC 20530-0001, - Certified Mail #7015-1730-0000-4700-3691

To: Channing D. Phillips U.S, Attorney General for the District of Columbia
555 Fourth Street, NW
Washington DC 20530- Certified mail#7015-1730-0000-4700-3707

To: Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Avenue,N.W.
Washington, D.C.20500-0001
Certified mail#7015-1730-0000-4700-3714

To: Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,

To: John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,
Certified mail#7015-1730-0000-4700-3714

To: Thomas E. Brandon in his official capacity as Acting Director of the United States Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

The Bureau of Alcohol, Tobacco, Firearms and Explosive(AFT)Agency,
99 New York Avenue, NE
Washington, DC 20226
Certified mail#7015-1730-0000-4700-3738

To: H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennyslvania Ave. N.W. Washington, DC 20500
Certified mail#7015-1730-0000-4700-3721

To: RYAN MORAN IN HIS OFFICIAL
CAPACITY AS ROYAL OAK POLICE
OFFICER

ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE THE STATE OF MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.

.

Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Default - Rule 55A (CO 40 Revised-4/2011)

UNITED STATES DISTRICT AND BANKRUPTCY COURTS
FOR THE DISTRICT OF COLUMBIA

Sharon Bridgewater- Claimant

Plaintiff(s)

Civil Action: (B.A.H.)

v.

Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Ave. NW
Washington DC 20500 et al

Defendant(s)

RE: ADMIRALITY AND MARITIME CLAIM

DEFAULT

It appearing that the above-named defendant(s) failed to plead or otherwise defend this action though duly served with complaint and warrant for arrest in rem on June 6, 2017, and an affidavit on behalf of the plaintiff having been filed, it is this 6th day of June, 2017 declared that defendant(s) is/are in default.

ANGELA D. CAESAR, Clerk

By: ______________________

Deputy Clerk

CERTIFICATE OF SERVICE

I Sharon Bridgewater the Petitioner certify that I sent the following below parties:

A TRUE AND CORRECT COPY OF THE:
Detroit

were sent by first class mail(in a properly-addressed envelope with postage duly paid) served before 5:00 p.m. on June 6, 2017 from Detroit, Michigan to the parties and/or attorneys of record for all parties in this action sent the true and correct copy to the addresses listed below:

To: Jeff Sessions in his official capacity as
Attorney General of the United States
Department of Justice
950 Pennsylvania Ave, NW Washington DC 20530-0001
Certified mail#7015-1730-0000-4700-3936

To: The Clerk of the Court for the United States Federal District Court of Columbia
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail

To: The Clerk of the Court for the UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT
333 Constitution Ave., N.W. Washington, DC 20001
Overnight mail

To: Kerry W. Kircher, General Counsel D.C. Bar No. 386816 at U.S. House of Representatives
219 Cannon House Office Building Washington, DC 20515
Certified mail#7015-1730-0000-4700-3677

To: John Russell Tyler, General Counsel for Eric Holder at 950 Pennsylvania Ave, NW Washington DC 20530-0001 - Certified mail #7015-1730-0000-4700-3684

To: Donald B. Verrilli , the Solicitor General of the United States, Room 5614 – Department of Justice, 950 Pennsylvania Ave, NW Washington DC 20530-0001, - Certified Mail #7015-1730-0000-4700-3691

To: Channing D. Phillips U.S, Attorney General for the District of Columbia
555 Fourth Street, NW
Washington DC 20530- Certified mail#7015-1730-0000-4700-3707

To: Donald Trump in his official capacity as United States President
The White House
1600 Pennsylvania Avenue,N.W.
Washington, D.C.20500-0001
Certified mail#7015-1730-0000-4700-3714

To: Rex Tillerson in his official capacity as Secretary of State

United States Department of State
2201 C Street
Washington, DC 20520,

To: John Kelly in his official capacity as Director of Homeland Security

United States Department of Homeland Security
245 Lane SW
Washington, DC 20528,
Certified mail#7015-1730-0000-4700-3714

To: Thomas E. Brandon in his official capacity as Acting Director of the United States Bureau of the Alcohol, Tobacco, FireArms and Explosives(ATF),

The Bureau of Alcohol, Tobacco, Firearms and Explosive(AFT)Agency,
99 New York Avenue, NE
Washington, DC 20226
Certified mail#7015-1730-0000-4700-3738

To: H.R. McMaster in his official capacity as National Security Advisor

National Security Counsel
The White House
1600 Pennyslvania Ave. N.W. Washington, DC 20500
Certified mail#7015-1730-0000-4700-3721

To: RYAN MORAN IN HIS OFFICIAL
CAPACITY AS ROYAL OAK POLICE
OFFICER

ROYAL OAK POLICE DEPARTMENT
AGENCY # 6371400
221 E. 3rd Street
Royal Oak, Michigan 48607- Certified mail #7015-1730-0000-4700-3745

AND

To: THE "UNKNOWN" JUDGES OF THE 44TH DISTRICT COURT OF THE THE STATE OF MICHIGAN – AND THE CLERK OF THE COURT

THE STATE OF MICHIGAN
44TH DISTRICT STATE COURT OF THE STATE OF MICHIGAN
400 EAST 11 MILE ROAD
ROYAL OAK, MI 48067 –certified mail number 7015-1730-0000-4700-3752

I certify and/or Declare and/or state under penalty and perjury and to pursuant to 28 U.S.C. §1746 that the foregoing is true and correct. Executed 6th day of June 2017 in Detroit, Michigan.

.

Sharon Bridgewater –Pro Se
Petitioner
18952 Dale Street
Detroit, MI 48219
313-471-8714
sbridge11@yahoo.com
ATTORNEY FOR THE ABOVE

Sharon Bridgewater
18592 Dale Street
Detroit, MI 48219
1-313-471-8714
Sbridge11@yahoo.com

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

Sharon Bridgewater

Claimant

VS.

Donald Trump in his Official Capacity as
United States President

The White House
1600 Pennsylvania Avenue, N.W
Washington, D.C.20500 et al

Defendant

CASE #__________(B.A.H.)

[PROPOSED] ORDER APPOINTING A SUBTITUTE CUSTODIAN, WITH TEMPORARY RESTRAINING ORDER, AND ORDER TO SHOW CAUSE PRELIMINARY AND/OR PERMENANT INJUNCTION

[redacted]

This cause heard on the motion of the Appellant Sharon Bridgewater in the above-entitled action, for a preliminary injunction and/or on the Appellants "verified brief and/or affidivant and complaint," and Donald Trump in opposition to the motion, and/or a reply is "waived," the court makes the following findings of fact and conclusion of law.

FINDINGS OF FACT

1. There is good cause to believe that Defendant/Respondent/Appellee Jeff Sessions in his official capacity as United States Attorney General et al have engaged in and are likely to engage in acts or practices that violate Rackeeteered Influenced and Corrupt organization act, and the Sharon Bridgewater Appellant/Claimant is likely to prevail on the merits

of this action.

2. There is good cause to believe that Sharon Bridgewater Appellant/ Claimant will suffer immediate and continuing harm unless Defendants are restrained and enjoined by Order of this Court. The Appellees did commit two or more predicate acts as defined in

18 USC section 1961[Rico prohibited] acts have been committed, and Donald Trump et el engaged in a pattern of Rackeeteering Activity and restrained interstate and foreign Commerce, has caused and continues to cause harm and damage to the Apppelants, have obstructed a congressional investigation and continues to obstruct a congressional investigation and no one has been held accountable, and further finds that the Executive Order 13780, discriminates on the basis of religion and nationality, violates the Constitution and the Immigration and Nationality Act ("INA")and/or violates the Appellants US Constitional rights and further violates international laws and/or treaties, and further finds that the Appellant is unlawfully, held to a condition of peonage and/or slavery in violation of international laws.

3. Weighing the equities and considering the Sharon Bridgewater the Plaintiff/Petitioner/Appellant/ likelihood of ultimate success, a TRO with writs of attachment, and expediated discovery, as to the existence and location of assets, and other equitable relief is in the public interest

4. No security is required of any agency of the Sharon Bridgewater the Plaintiff/Petitioner/Appellant/ Claimant for issuance of a restraining order. Fed. R. Civ.

DEFINITION

For purposes of this Order, the following defmitions shall apply:

6

1. "Asset" or "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property of Defendants, or held for the benefit of Defendants, wherever located, whether in the United States or abroad, including but not limited to chattels, goods, instruments, equipment, fixtures, general intangibles, effects, leaseholds, contracts, mail or other deliveries, inventory, checks, notes, accounts, credits, receivables (as those terms are defmed in the Uniform Commercial Code), shares of stock, futures, and all cash and currency, trusts, including but not limited to any trust held for the benefit of any Defendant, any Individual Defendant's minor children, or any of the Individual Defendants' spouses, and shall include both existing assets and assets acquired after entry of this Order.

2. "Corporate Defendants" means “ALL DENDANTS” LISTED ON THE COMPLAINT:

; and their d/b/a's, successors, and assigns.

3. "Defendants" means all of the Individual Defendants and Corporate Defendants individually, collectively, or in any combination.

4. "Document" and "Electronically Stored Information" are synonymous in meaning and equal in scope to the usage of the tenns in Rule 34(a) of the Federal Rules of Civil Procedure and include, but are not limited to:

a. The original or a true copy of any written, typed, printed, electronically stored, transcribed, taped, recorded, filmed, punched, or graphic matter or other data compilations of any kind, including, but not limited to, letters, email, or other correspondence, messages, memoranda, interoffice communications, notes, reports, summaries, manuals, magnetic tapes or discs, tabulations, books, records, checks, invoices, work papers, journals, ledgers, statements, returns, reports, schedules, or files; and

4

b. Any electronically stored information stored on any server, smartphone, or any type of mobile device, flash drives, personal digital assistances ("PDAs"), desktops computer and workstations, laptops notebooks, and other portable computers, or other electronic storage media, whether assigned to individuals or in pools of computers available for shared use, or personally owned but used for work-related purposes; backup disks and tapes, archive disks and tapes, and other fonns of offline storage, whether stored onsite with the computer used to generate them, stored offsite in another computer facility, or stored, hosted, or otherwise maintained offsite by a third party; and computers and related offline
storage used by Defendants or Defendants' participating associates, which may
include persons who are not employees of the company or who do not work on
company premises.

5. "Electronic Data Host" means any person or entity in the business of storing, hosting, or otherwise maintaining electronically stored information.

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6. "Financial Institution" means any bank, savings and loan institution, credit union, or any financial depository of any kind, including, but not limited to, any brokerage house, trustee, broker-dealer, escrow agent, title company, commodity trading company, or precious metal dealer.

7. "Individual Defendants" means Jeff Sessions in his official capacity as United States Attorney General et al Defendant/Respondent/Appellee.

8. "Person" means any individual, group, unincorporated association, limited general partnership, corporation, or other business entity.

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7. The term "employee" means agent, borrowed employee, casual employee, consultant, contractor, de facto employee, independent contractor, joint adventurer, loaned employee, part-time employee, permanent employee, personnel, provisional employee, staffer, subcontractor, or any other type of service provider.

8. The terms "Target Number 1" and "Target Number 2" mean the individuals identified as such during the October 5, 2011 briefing for congressional staff provided by FBI, DEA, ATF, and DOJ employees at DOJ headquarters.

9. "Substitute Custodianship Defendants" refers to Corporate Defendants, as well as any successors, assigns, affiliates, and subsidiaries that conduct any business related to Defendants' placement of third party charges on mobile phone bills and which the Temporary Substitute Custodian has reason to believe are owned or controlled in whole or part by any of the Defendants.

I.
PROHIBITED PRACTICES

IT IS HEREBY ORDERED that Jeff Sessions in his official capacity as United States Attorney General et al Defendant/Respondent/Appellee, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, and their officers, agents, servants, employees, attorneys, and those persons or entities in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, are temporarily restrained and enjoined from engaging in a pattern of racketeering activity and/or placing or assisting others in placing any charge on a consumer's telephone bill, or from representing or assisting others in representing, directly or indirectly, expressly or by implication, that a consumer is obligated to pay any charge on a telephone bill, unless Defendants have obtained the consumer's express informed consent to the charge and Defendants have made and maintained a record of the consent.

II.

PROHIBITION REGARDING CONSUMER INFORMATION

IT IS FURTHER ORDERED that Defendants, directly or through any corporation, partnership, subsidiary, division, trade name, or other device, and their officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, are temporarily restrained and enjoined from selling, transferring, or disclosing consumer information, including the name, address, telephone number, email address, social security number, birthdate, or other identifying information, or any other data that enables access to a consumer's account (including, but not limited to, a credit card, bank account, telephone billing account or other fmancial account), of any person or entity, which Defendants obtained prior to entry of this Order in connection with Defendants' services.

ASSET FREEZE

IT IS FURTHER ORDERED that Defendants and their officers, agents, servants, employees, and attorneys, and all other persons or entities in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, each are hereby temporarily restrained and enjoined from directly or indirectly:

7

A. Selling, liquidating, assigning, transferring, converting, loaning, hypothecating, disbursing, gifting, conveying, encumbering, pledging, concealing, dissipating, spending, withdrawing, granting a lien or security interest or other interest in, or otherwise disposing of any asset (including but not limited to funds, real or personal property, contracts, and consumer lists), or any interest therein, wherever located, including any asset outside the territorial United States that is:

part;

1. owned or controlled by any of the Defendants, in whole or in

2.

3.

in the actual or constructive possession of any Defendant; held by an agent of any of the Defendants, as a retainer for the agent's provision of services to a Defendant;

4. owned, controlled by, or in the actual constructive possession of, or otherwise held for the benefit of, any corporation, partnership, or other entity directly or indirectly owned or controlled by any of the Defendants; including, but not limited to, assets held by any Defendant in any account at any bank or savings and loan institution, such as accounts over which the Individual Defendants have signatory authority, with any broker-dealer, escrow agent, title company, precious metal dealer, transaction processor, customer service agent, commercial mail receiving or forwarding agency, or other financial institution of any kind.

B. Opening, or causing to be opened, any safe-deposit boxes titled in the name of or subject to access by any Defendant;

C. Incurring charges or cash advances on any credit card, stored value card, debit card, or charge card issued in the name, singly or jointly, of any

8

Defendant or any other entity directly or indirectly owned, managed, or controlled by any Defendant;

D. Failing to disclose to the SHARON BRIDGEWATER APPELLANT, immediately upon service of this

Order, information that fully identifies each asset of the Defendants, and each entity holding such asset, including, but not limited to, the entity's name, address, and telephone number, the number of the account, and the name under which the account is held.*Provided,* that the freeze imposed in this Section shall be construed to exclude assets that any of the Defendants acquires following service of this Order, but only if the Defendant can prove that such assets are not derived from activity prohibited by this Order. *Provided further,* that this Section does not prohibit transfers to the Temporary Substitute Custodian as specifically required by this Order.

IV.

RETENTION OF ASSETS AND DOCUMENTS BY THIRD PARTIES

IT IS FURTHER ORDERED that any financial or brokerage institution, business entity, electronic data host, or person served with a copy of this Order that holds, controls, or maintains custody of any account, document, electronically stored information, or asset of, on behalf of, in the name of, for the benefit of, subject to withdrawal by, subject to access or use by, or under the signatory power of any Defendant or other party subject to Section III above, or has held, controlled, or maintained any such account, document, electronically stored information, or asset, shall:

A. Hold, preserve, and retain within its control and prohibit the removal, withdrawal, transfer, encumbrance, pledge, assignment, dissipation, sale, alteration, or other disposal of any such account, other asset, or documents, except as directed in writing by counsel for the SHARON BRIDGEWATER APPELLANT, by the Temporary Substitute Custodian (with respect to assets of any of the Substitute Custodianship Defendants), or by further order of this Court;

B. . Provide the Temporary Substitute Custodian, the SHARON BRIDGEWATER APPELLANT, and their agents access to

electronically stored information stored, hosted, or otherwise maintained on behalf

of Defendants for forensic imaging;

C. Deny access to any safe deposit box titled individually or jointly in

name of, or otherwise subject to access by, any of the Defendants;

D. Provide to the SHARON BRIDGEWATER APPELLANT and to the Temporary Substitute Custodian, within five (5) business days of notice of this Order, a sworn statement setting forth:

1.

2.

The identification of each account or asset;

The balance of each account or a description of the nature and

value of each asset as of the close of business on the day notification of this Order

is received, and, if the account or asset has been closed or moved, the balance or

value removed and the person or entity to whom it was transferred; and

3. The identification of any safe-deposit box titled in the name of

or subject to access by any of the Defendants.

E. Upon request by counsel for the SHARON BRIDGEWATER APPELLANT (or by the Temporary Substitute Custodian,

with respect to assets held for any of the Substitute Custodianship Defendants), promptly

(11)

provide the SHARON BRIDGEWATER APPELLANT or the Temporary Substitute Custodian with copies of all records or other documentation pertaining to such account or asset, including but not limited to originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, all other debit and credit instruments or slips, currency transaction reports, 1 099 forms, and safedeposit box logs; and

F. At the direction of the SHARON BRIDGEWATER APPELLANT (or the Temporary Substitute Custodian, with respect to assets held for any of the Substitute Custodianship Defendants), and without further order this Court, convert any stocks, bonds, options, mutual funds, or other securities to their cash equivalents.

IT IS FURTHER ORDERED that the accounts subject to this provision include existing assets and assets deposited after the effective date of this Order. This Section shall not prohibit transfers in accordance with any provision of this Order, or any further order of the Court.

V.

FINANCIAL REPORTS

IT IS FURTHER ORDERED that within three (3) business days of service of this Order:

A. Each of the Individual Defendants shall complete and deliver to the

SHARON BRIDGEWATER APPELLANT the Financial Statement captioned "Financial Statement of Individual Defendant," a copy of which is attached hereto as Attachment 1;

B. The Individual Defendants shall prepare and deliver to the SHARON BRIDGEWATER APPELLANT and the Temporary Substitute Custodian, the Financial Statement captioned "Financial Statement of Corporate Defendant," a copy of which is attached hereto as Attachment 2, for each Corporate Defendant of which he or she is a member, officer, a majority owner or otherwise controls;

C. Each of the Individual Defendants shall, on behalf of each business entity (whether a partnership, limited partnership, joint venture, sole proprietorship, limited liability company, corporation, or otherwise) of which he or she is the majority owner or otherwise controls, other than the Corporate Defendants, complete and deliver to the SHARON BRIDGEWATER APPELLANT and Temporary Substitute Custodian a separate copy of the "Financial Statement of Corporate Defendant" for that corporate entity; and

27 D. Defendants shall provide the SHARON BRIDGEWATER APPELLANT and Temporary Substitute Custodian access to

28 records and documents pertaining to assets of any of the Defendants that are held by fmancial institutions outside the territory of the United States by signing a consent to release of financial records if requested by the SHARON BRIDGEWATER APPELLANT.

VI.

CREDIT REPORTS

IT IS FURTHER ORDERED that the SHARON BRIDGEWATER APPELLANT may obtain credit reports

concerning any of the Defendants pursuant to Section 604(a){l) of the Fair Credit Reporting Act, 15 U.S. C. § 1681 b(a)(1), and that, upon written request, any credit reporting agency from which such reports are requested shaH provide them to the SHARON BRIDGEWATER APPELLANT.

VII.
REPATRIATION OF ASSETS

IT IS FURTHER ORDERED that within five (5) business days following service of this Order, each of the Defendants shall:

A. Repatriate to the United States all funds, documents, or assets in foreign countries held either: (1) by them; (2) for their benefit; or (3) under their direct or indirect control, jointly or singly;

B. The same business day as any repatriation under paragraph A above,

1. Notify the SHARON BRIDGEWATER APPELLANT and the Temporary Substitute Custodian of the name and location of the fmancial institution or other entity that is the recipient of such funds, documents, or assets; and

2. Serve this Order on any such financial institution or other entity;

C. Provide the SHARON BRIDGEWATER APPELLANT and the Temporary Substitute Custodian with a full accounting of all funds, documents, and assets outside of the territory of the United States held either: (1) by them; (2) for their benefit; or (3) under their direct or indirect control, jointly or singly;

1

D. Hold and retain all repatriated funds, documents, and assets and prevent any transfer, disposition, or dissipation whatsoever of any such assets or funds; and

E. Provide the SHARON BRIDGEWATER APPELLANT and Temporary Substitute Custodian access to all records of accounts or assets of the Defendants held by financial institutions located outside the territorial United States by signing the Consent to Release of Financial Records if requested by the SHARON BRIDGEWATER APPELLANT.

VIII.
PRESERVATION OF RECORDS AND TANGIBLE THINGS

IT IS FURTHER ORDERED that Defendants, and their agents, servants, employees, and attorneys, and all persons or entities directly or indirectly under the control of any of them, and an other persons or entities in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, and each such person, are hereby temporarily restrained and enjoined from destroying, erasing, mutilating, concealing, altering, transferring or otherwise disposing of, in any manner, directly or indirectly, any documents that

relate to the business practices or finances of any of the Defendants, including, but not limited to, such documents as any contracts, accounting data, correspondence, advertisements, computer tapes, discs or other computerized records, books, written or printed records, handwritten notes, telephone logs, telephone scripts, receipt books, ledgers, personal and business canceled checks and check registers, bank statements, appointment books, and copies of federal, state, or local business or personal income or property tax returns. This Section specifically applies to all documents that have been or are displayed on or have been or are accessible from any and all Internet websites owned or controlled by any Defendant.

IX.
RECORD KEEPING

IT IS FURTHER ORDERED that each of the Individual Defendants is hereby temporarily restrained and enjoined from failing to make and keep, and to provide to SHARON BRIDGEWATER APPELLANT counsel promptly upon request, an accurate accounting that, in reasonable detail, accurately, fairly, and completely reflects such Defendant's income (including all income resulting from any services, activity, or efforts rendered by such Defendant), disbursements, transactions, and use of money, beginning immediately upon service or actual notice of this Order, and continuing daily until otherwise ordered by the Court.

X.

NOTIFICATION OF BUSINESS ACTIVITIES

IT IS FURTHER ORDERED that:

A. Each of the Individual Defendants is hereby temporarily restrained and enjoined from directly or indirectly creating, operating, or exercising any control over any business entity, including any partnership, limited partnership, joint venture, sole proprietorship or corporation, without first serving on counsel for the SHARON BRIDGEWATER APPELLANT a written statement disclosing the following: (1) the name of the business entity; (2) the business entity's contact information (including physical address, email address, and telephone number); (3) the names of the business entity's officers, directors, principals, managers, and employees; and (4) a detailed description of the business entity's intended or actual activities.

B. Each of the Individual Defendants shall notify the SHARON BRIDGEWATER APPELLANT at least seven

(7) days prior to affiliating with, becoming employed by, or performing any work

for any business that is not a named Defendant in this action. Each notice shall include the Defendant's new business address and a statement of the nature of the business or employment and the nature of his or her duties and responsibilities in connection with that business or employment.

XI.
IMMEDIATE ACCESS TO DEFENDANTS' RECORDS

IT IS FURTHER ORDERED that:

A. Defendants and their successors, assigns, officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, and the Temporary Substitute Custodian, shall allow the SHARON BRIDGEWATER APPELLANT's representatives

immediate access to the business premises, mail drops, storage facilities, and all other business locations owned, controlled, or used by Defendants, including, but not limited to business premises at 879 W. !90th Street, Suite 400, 402, and 417, Gardena, CA 90248. The purpose of the access shall be to effect service and to inspect and copy materials relevant to this action. The SHARON BRIDGEWATER APPELLANT shall have the right to

remove documents from Defendants' premises in order that they may be inspected, inventoried, and copied. The SHARON BRIDGEWATER APPELLANT shall return any such removed documents within three (3) business days, or such time-period that is agreed upon by the SHARON BRIDGEWATER APPELLANT and

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Defendants. Defendants, to the extent they are in possession of documents relevant to this action, shall provide the SHARON BRIDGEWATER APPELLANT with the means necessary to access these documents, including without limitation keys and combinations to locks, computer

access codes, and storage area access information; and

B. The Temporary Substitute Custodian shall subsequently allow the SHARON BRIDGEWATER APPELLANT's representatives, the representatives of the Defendants, and each of the Individual Defendants reasonable access to the business premises of the Substitute Custodianship Defendants. The purpose of this access shall be to inspect and copy any and all books, records, accounts, and other property owned by or in the possession of the Substitute Custodianship Defendants. The Temporary Substitute Custodian shall have the discretion to

determine the time and manner of this access; and

C. If, at the time of service of this Order, any records or property relating to Defendants' business or assets are located in the personal residence of any of the Individual Defendants or in any other non-business location in their personal control, then he shall, within forty-eight (48) hours of service of this Order, produce to the SHARON BRIDGEWATER APPELLANT, at a location designated by the SHARON BRIDGEWATER APPELLANT, the following:

1. All contracts, accounting data, written or electronic correspondence, advertisements, computer tapes, discs, or other computerized or electronic records, books, written or printed records, handwritten notes, telephone logs, telephone scripts, telephone bills, receipt books, ledgers, membership records and lists, refund records, receipts, ledgers, bank records (including personal and business monthly statements, canceled checks, records of wire transfers, and check registers), appointment books, copies of federal, state, and local business or personal income or property tax

returns, 1099 forms, title records, and other documents or records of any kind that relate to Defendants' business and assets; and

2. All computers and data in whatever form, used by Defendants, in whole or in part, relating to Defendants' business and assets.

XII.
ORDER APPOINTING SUBSTITUTE CUSTODIAN, RULE E(4)(d)

IT IS FURTHER ORDERED ____

____ appointed Temporary Substitute Custodian ("Substitute Custodian") for Sharon Bridgewater Defendants

XIII.
SUBSTITUTE CUSTODIANSHIP DUTIES

IT IS FURTHER ORDERED that the Substitute Custodian is directed and authorized to accomplish the following:

A. Assume full control of the Substitute Custodianship Defendants by removing, as the Temporary Substitute Custodian deems necessary or advisable, any director, officer, independent contractor, employee, or agent of any Substitute Custodianship Defendant, including any named Defendant, from control of, management of, or participation in, the affairs of the Substitute Custodianship Defendant;

B. Take exclusive custody, control, and possession of all assets, documents, and electronically stored information of, or in the possession, custody, or under the control of, the Substitute Custodianship Defendants, wherever situated. The Temporary Substitute Custodian shall have full power to divert mail and to sue for, collect, receive, take in possession, hold, and manage all assets and documents of the Substitute Custodianship Defendants and other persons or entities whose interests are now held by or under the direction, possession, custody, or control of the Substitute Custodianship Defendants. Provided, however, that the Temporary Substitute Custodian shall not attempt to collect or receive any amount from a consumer if the Substitute Custodian believes the consumer was a victim of the unlawful conduct alleged in the complaint in this matter;

C. Take all steps necessary to secure all premises owned, rented, leased, or otherwise controlled by the Substitute Custodianship Defendants, including but not limited to all such premises located at 879 W. !90th Street, Suite 400, 402, and 417, Gardena, CA 90248. Such steps may include, but are not limited to, the following, as the Substitute Custodian deems necessary or advisable:

I. Serving this Order;

2. Completing a written inventory of all Substitute Custodianship assets;

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3. Obtaining pertinent information from all employees and other agents of the Substitute Custodianship Defendants, including, but not limited to, the name, home address, social security number, job description, method of compensation, and all accrued and unpaid commissions and compensation of each such employee or agent, and all computer hardware and software passwords;

4. Videotaping all portions of the location;

5. Securing the location by changing the locks and disconnecting any computer modems or other means of access to the computer or other records maintained at that location;

6. Requiring any persons present on the premises at the time this Order is served to leave the premises, to provide the Substitute Custodian with proof of identification, or to demonstrate to the satisfaction of the Substitute Custodian that such persons are not removing from the premises documents or assets of the Substitute Custodianship Defendants; and

7. Requiring all employees, independent contractors, and consultants of the Substitute Custodianship Defendants to complete a Questionnaire submitted by the Substitute Custodian;

D. Conserve, hold, and manage all assets of the Substitute Custodianship Defendants, and perform all acts necessary or advisable to preserve the value of those assets, in order to prevent any irreparable loss, damage, or injury to consumers or to creditors of the Substitute Custodianship Defendants, including, but not limited to, obtaining an accounting of the assets and preventing transfer, withdrawal, or misapplication of assets;

E. Enter into contracts and purchase insurance as the Substitute Custodian deems to be advisable or necessary;

F. Prevent the inequitable distribution of assets and determine, adjust, and protect the interests of consumers and creditors who have transacted business with the Substitute Custodianship Defendants;

G. Manage and administer the business of the Substitute Custodianship Defendants until further order of this Court by performing all incidental acts that the Substitute Custodian deems to be advisable or necessary, which includes retaining, hiring, or dismissing any employees, independent contractors, or agents;

H. Choose, engage, and employ attorneys, accountants, appraisers, and other independent contractors and technical specialists, as the Substitute Custodian deems advisable or necessary in the performance of duties and responsibilities under the authority granted by this Order. The Temporary Substitute Custodian may engage the services of the law firm of which the Temporary Substitute Custodian is a member;

I. Make payments and disbursements ftom the Substitute Custodianship estate that are necessary or advisable for carrying out the directions of, or exercising the authority granted by, this Order. The Substitute Custodian shall apply to the Court for prior approval of any payment of any debt or obligation incurred by the Substitute Custodianship Defendants prior to the date of entry of this Order, except payments that the Substitute Custodian deems necessary or advisable to secure assets of the Substitute Custodianship Defendants, such as rental payments;

J. Determine and implement the manner in which the Substitute Custodianship Defendants will comply with, and prevent violations of, this Order and aH other

(17)

applicable laws, including, but not limited to, obtaining consumers' express agreement to the placement of charges on the consumers' telephone bills prior to

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billing consumers and making and maintain records of the agreement. Such verification may include contacting the Substitute Custodianship Defendants' existing consumers, via text message or otherwise, to determine whether such consumers (a) authorized such billing, and (b) agree to continue such billing.

K. Institute, compromise, adjust, appear in, intervene in, or become party to such actions or proceedings in state, federal, or foreign courts that the Substitute Custodian deems necessary and advisable to preserve or recover the assets of the Substitute Custodianship Defendants, or that the Substitute Custodian deems necessary and advisable to carry out the Substitute Custodian's mandate under this Order;

Defend, compromise, adjust, or otherwise dispose of any or all actions or proceedings instituted in the past or in the future against the Substitute Custodian in his role as Substitute Custodian, or against the Substitute Custodianship Defendants, that the Substitute Custodian deems necessary and advisable to preserve the assets of the Substitute Custodianship Defendants or that the Substitute Custodian deems necessary and advisable to carry out the Substitute Custodian's mandate under this Order;

M. Continue and conduct the business of the Substitute Custodianship Defendants in such manner, to such extent, and for such duration as the Substitute Custodian may in good faith deem to be necessary or appropriate to operate the business profitably and lawfully, if at all; provided, however, that the continuation and conduct of the business shall be conditioned upon the Substitute Custodian's good faith determination that the businesses can be lawfully operated at a profit using the assets of the Substitute Custodianship estate;

N. Take depositions and issue subpoenas to obtain documents and records pertaining to the Substitute Custodianship estate and compliance with this Order. Subpoenas may be served by agents or attorneys of the Substitute Custodian and by agents of any process server retained by the Substitute Custodian;

0. Open one or more bank accounts in the Central District of California as designated depositories for funds of the Substitute Custodianship Defendants. The Substitute Custodian shall deposit all funds of the Substitute Custodianship Defendants in such a designated account and shall make all payments and disbursements from the Substitute Custodianship estate from such account(s);

P. Maintain accurate records of all receipts and expenditures that he makes as Substitute Custodian;

Q. Upon request by any party, make available to that party within three calendar days copies of any documents obtained pursuant to the Substitute Custodianship;

R. Cooperate with reasonable requests for information or assistance from any state or federal law enforcement agency.

XIV.

COOPERATION WITH THE SUBSTITUE

<handwritten initials>

CUSTODIAN

IT IS FURTHER ORDERED that:

A. Defendants, and their officers, agents, servants, employees, and attorneys, and all persons or entities directly or indirectly under the control of any of them, and all other persons or entities in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, and each such person, shall fully cooperate with and assist the Temporary Substitute Custodian. Such cooperation and assistance shall include, but not be limited to:

1. Providing any information to the Substitute Custodian that the Substitute Custodian deems necessary to exercising the authority and discharging the responsibilities of the Temporary Substitute Custodian under this Order, including, but not limited to, allowing the Temporary Substitute Custodian to inspect documents and assets;

2. Identifying any locations where any Substitute Custodianship Defendant conducts business, sales or customer service operations, or maintains records or assets;

3. Providing any user name or password required to access any computer or electronic files in any medium, including but not limited to electronically stored information stored, hosted, or otherwise maintained by an electronic data host; or

4. Advising all persons who owe money to the Substitute Custodianship Defendants that all debts should be paid directly to the Temporary Substitute Custodian.

B. Defendants, and their officers, agents, servants, employees, and attorneys, and aJl persons or entities directly or indirectly under the control of any of them, and all other persons or entities in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise, and each such person, are hereby temporarily restrained and enjoined from directly or indirectly:

5. Transacting any of the business of the Substitute Custodianship Defendants;

6. Destroying, concealing, defacing, transferring, or otherwise altering or disposing of any documents or equipment of the Substitute Custodianship Defendants, including, but not limited to, books, records, accounts, or any other papers of any kind or nature;

7. Transferring, receiving, altering, selling, encumbering, pledging, assigning, liquidating, or otherwise disposing of any assets owned, controlled, or in the possession or custody of, or in which an interest is held or claimed by, the Substitute Custodianship Defendants, or the Temporary Substitute Custodian;

C. Excusing debts owed to the Substitute Custodianship Defendants;

D. Failing to notify the Temporary Substitute Custodian of any asset, including accounts, of any Substitute Custodianship Defendant held in any name other than the name of any Substitute Custodianship Defendant, or by any person or entity other than the Substitute Custodianship Defendants, or failing to provide any assistance or information requested by the Temporary Substitute Custodian in connection with obtaining possession, custody, or control such assets; or

E. Doing any act or refraining from any act whatsoever to interfere with

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the Temporary Substitute Custodian's taking custody, control, possession, or managing of the assets or documents subject to this Substitute Custodianship; or to harass or interfere with the Temporary Substitute Custodian in any way; or to interfere in any manner with the exclusive jurisdiction of this Court over the assets or documents of the Substitute Custodianship Defendants; or to refuse to cooperate with the Temporary Substitute Custodian or the Temporary Substitute Custodian's duly authorized agents in the exercise of their duties or authority under any Order of this Court.

XV.
DELIVERY OF SUBSTITUTE CUSTODIANSHIP PROPERTY

IT IS FURTHER ORDERED that immediately upon service ofthis Order upon them or upon their otherwise obtaining actual knowledge of this Order, or within a period pennitted by the Substitute Custodian, Defendants and their officers, agents, servants, employees, and attorneys, and all other persons or entities in active concert or participation with any of them who receive actual notice of this Order by personal service or otherwise shall transfer or deliver access to, possession, custody, and control of the following to the Substitute Custodian:

A. All assets of the Substitute Custodianship Defendants;

B. All documents and electronically stored information of the Substitute Custodianship Defendants, including, but not limited to, books and records of accounts, all financial and accounting records, balance sheets, income statements, bank records (including monthly statements, canceled checks, records of wire transfers, records of ACH transactions, and check registers), client or customer lists, title documents and other papers;

C. All assets belonging to members of the public now held by the Substitute Custodianship Defendants;

D. All keys, computer and other passwords, entry codes, combinations to locks required to open or gain or secure access to any assets or documents of the Substitute Custodianship Defendants, wherever located, including, but not limited to, access to their business premises, means of communication, accounts, computer systems, or other property; and

E. Information identifying the accounts, employees, properties, or other assets or obligations of the Substitute Custodianship Defendants.

IT IS FURTHER ORDERED that, in the event any person or entity fails to deliver or transfer immediately any asset or otherwise fails to comply with any provision of this Section, the Temporary Substitute Custodian may file *ex parte* with the Court an Affidavit ofNon-Compliance regarding the failure. Upon filing of the affidavit, the Court may authorize, without additional process or demand, Writs of Possession or Sequestration or other equitable writs requested by the Substitute Custodian. The writs shall authorize and direct the United States Marshal or any sheriff or deputy sheriff of any county (pursuant to Fed. R. Civ. P. 4(c)(l)) to seize the asset, document, or other thing and to deliver it to the Substitute Custodian.

XVI.
COMPENSATION FOR SUBSTITUTE CUSTODIAN

IS FURTHER ORDERED that the Temporary Substitute Custodian and all personnel hired by the Temporary Substitute Custodian as herein authorized, including counsel to the Substitute Custodian and accountants, are entitled to reasonable compensation for the performance of duties pursuant to this Order, and for the cost of actual out-ofpocket expenses incurred by them, from the assets now held by or in the possession or control of, or which may be received by, the

Substitute Custodianship Defendants. The Temporary Substitute Custodian shall file with the Court and serve on the parties periodic requests for the payment of such reasonable compensation, with the first such request filed no more than sixty (60) days after the date of this Order. The Substitute Custodian shall not increase the hourly rates used as the bases for such fee applications without prior approval of the Court.

XVII.

SUBSTITUTE CUSTODIAN'S REPORTS

IT IS FURTHER ORDERED that the Substitute Custodian shall report to this Court on or before the date set for the hearing to Show Cause regarding the Preliminary Injunction, regarding: (1) the steps taken by the Temporary Substitute Custodian to implement the terms of this Order; (2) the value of aU liquidated and unliquidated assets of the Substitute Custodianship Defendants; (3) the sum of all liabilities of Corporate Defendants; (4) the steps the Temporary Substitute Custodian intends to take in the future to: (a) prevent any diminution in the value of assets ofthe Substitute Custodianship Defendants, (b) pursue Substitute Custodianship assets from third parties, and (c) adjust the

liabilities of the Substitute Custodianship Defendants, if appropriate; (5) the Temporary Substitute Custodian's assessment of whether the business can be operated in compliance with this Order; and (6) any other matters which the Substitute Custodian believes should be brought to the Court's attention. *Provided, however,* if any of the required information would hinder the Temporary Substitute Custodian's ability to pursue Substitute Custodianship assets, the portions of the

Temporary Substitute Custodian's report containing such information may be filed under seal and not served on the parties. Such repmis, including reports filed under seal and not served on the parties, may include

requests for instructions by the Temporary Substitute Custodian and proposed orders thereon.

This order alone authorizes the filing under seal and no additional request to file under seal is required.

XVIII.

SUBSTITUTE CUSTODIAN'S BOND

IT IS FURTHER ORDERED that the Temporary Substitute Custodian shall file with the Clerk of this Court a bond in the sum of Zero with sureties to be approved by the Court, conditioned that the Substitute Custodian will well and truly perform the duties of the office and abide by and perform all acts the Court directs.

XIX.

BANKRUPTCY PETITIONS

IT IS FURTHER ORDERED that, in light of the asset freeze and appointment of the Temporary Substitute Custodian, Defendants are hereby prohibited from filing, or causing to be filed, on behalf of any Substitute Custodianship Defendant, a petition for relief under the United States Bankruptcy Code, 11 U.S.C. § 101 et seq., without prior permission from this Court.

IT IS FURTHER ORDERED that, in light of the asset freeze, Individual Defendants must give 21 days' notice to the Sharon Bridgewater prior to filing, or causing to be filed, on behalf of the Individual Defendants, a petition for relief under the United States Bankruptcy Code, 11 U.S.C. § 101 et seq.

XX.
STAY OF ACTIONS

IT IS FURTHER ORDERED that:

A. Except by leave of this Court, during pendency of the Substitute Custodianship ordered herein, Defendants and all customers, principals, investors, creditors, stockholders, lessors, and other persons (except for the FTC) seeking to establish or enforce any claim, right, or interest against or on behalf of any of the Corporate Defendants, and all others acting for or on behalf of such persons, including attorneys, trustees, agents, sheriffs, constables, marshals, and other officers and their deputies, and their respective attorneys, servants, agents, and employees, shall be and are hereby stayed from:

1. Commencing, prosecuting, continuing, entering, or enforcing any suit or proceeding, except that such actions may be filed to toll any applicable statute of limitations;

2. Accelerating the due date of any obligation or claimed obligation; filing or enforcing any lien; taking or attempting to take possession, custody, or control of any asset; attempting to

foreclose, forfeit, alter, or terminate any interest in any asset, whether such acts are part of a judicial proceeding, are acts of self-help, or otherwise;

3. Executing, issuing, serving, or causing the execution, issuance or service of, any legal process, including, but not limited to, attachments, garnishments, subpoenas, writs of replevin, writs of execution, or any other form of process whether specified in this Order or not; or

4. Doing any act or thing whatsoever to interfere with the Substitute Custodian taking custody, control, possession, or management of the assets or documents subject to this Substitute Custodianship; to harass or interfere with the Temporary Substitute Custodian in any way; or to interfere in any manner with the exclusive jurisdiction of this Court over the assets or documents of the Substitute Custodianship Defendants;

B. This Section does not stay:

1. The commencement or continuation of a criminal action or proceeding;

2. The commencement or continuation of an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power;

3. The enforcement of a judgment, other than a money judgment, obtained an action or proceeding by a governmental unit to enforce such governmental unit's police or regulatory power; or

4. The issuance to any Substitute Custodianship Defendant of a notice of tax deficiency; and

C. Except as otherwise provided in this Order, all persons and entities in need of documentation from the Temporary Substitute Custodian shall in all instances first attempt to secure such information by submitting a formal written request to the Substitute Custodian, and, if such request has not been responded to within thirty (30) days of receipt by the Temporary Substitute Custodian, any such person or entity may thereafter seek an Order of this Court with regard to the relief requested.

XXI.
EXPEDITED DISCOVERY

IT IS FURTHER ORDERED that the Sharon Bridgewater, and/or the Special prosecutor and/or authorized person of this court are granted leave at any time after service of this Order to:

A. Take the deposition of any person or entity, without limitation, for the purpose of:

1. Discovering the nature, location, status, and extent of assets of any of the Defendants, including Substitute Custodianship Defendants, or of their affiliates or of their subsidiaries;

2. Discovering the nature, location, status, and extent of documents reflecting business transactions of any of the Defendants;

3. Discovering the nature and extent of Defendants' business activities; and

B. Demand the production of documents from any person or entity relating to the nature, status, location and extent of any of the Defendant's assets, and the location of any documents reflecting the Defendants' assets, and the location of any documents reflecting the Defendants' business transactions or the nature and extend of Defendants' business operations. Forty-eight (48) hours' notice shall be deemed sufficient for any such deposition and seventy-two **(72)** hours' notice shall be deemed sufficient for the production of any such documents. The limitations and conditions set forth in Fed. R. Civ. P. 30(a)(2) and 31(a)(2) shall not apply to the depositions taken pursuant to this Section. Any such depositions taken pursuant to this Section shall not be

counted toward the ten deposition limit set forth in Fed. R. Civ. P. 30(a)(2)(A) and

3l(a)(2)(A). Service of discovery taken pursuant to this section shall be sufficient if made by facsimile or by overnight delivery.

XXII.

DEFENDANTS' DUTY TO DISTRIBUTE ORDER

IT IS FURTHER ORDERED that Defendant/Respondent/Appellee Jeff Sessions in his official capacity as United States Attorney General et al shall immediately provide a copy of this Order to each affiliate, subsidiary, division, sales entity, successor, assign, officer, director, employee, independent contractor, salespersons, client company, electronic data host, agent, attorney, spouse, and representative of Defendants and shall, within three (3) calendar days from the date of entry of this Order, provide counsel for the Sharon Bridgewater with a sworn statement that: (1) confirms that Defendants have provided copies of the Order as required by this Section and (2) lists the names and addresses of each entity or person to whom Defendants provided a copy of the Order. Furthermore, Defendants shall not take any action that would encourage officers, agents, directors, employees, salespersons, independent contractors, attorneys, subsidiaries, affiliates, successors, assigns, representatives, or other persons or entities in active concert or participation with Defendants to disregard this Order.

XXIII.

CORRESPONDENCE

IT IS FURTHER ORDERED that, for the purposes of this Order, all correspondence and service of pleadings on Plaintiff Sharon Bridgewater shall be addressed to:

(2)

The Defendants have engaged in a pattern of racketeering activity and the Plaintiff is responsible for allSh

XXIV.
PRELIMINARY INJUNCTION HEARING

Donald Trump

IT IS FURTHER ORDERED that Defendant [redacted] in his official capacity as United States

show cause, if any there be, why this Court should not enter a preliminary injunction, pending fmal ruling on the Complaint, against said Defendants enjoining the violations of law alleged in Sharon Bridgewater Complaint, continuing the freeze of their assets, appointing a permanent Substitute Custodian over Corporate Defendants and imposing such additional relief as may be appropriate.

IT IS FURTHER ORDERED that, in support of its application for a preliminary injunction, Plaintiff FTC may submit supplemental evidence discovered subsequent to the filing of its application for a TRO, as well as a supplemental memorandum. Plaintiff Sharon Bridgweater shall file and serve any supplemental evidence and memorandum by no later than 4:30p.m. on the sixth court day prior to the preliminary injunction hearing as scheduled above. Such documents may be served on each Defendant by emailing, faxing, or delivering the document(s) to the attorney for the Defendant, or, if the Defendant is not represented by counsel, to a fax number or email address previously designated by the Defendant in writing to counsel for Plaintiff FTC; if the Defendant has not so designated a fax number or email address, service may be effected by mailing the documents to an address designated in writing by the Defendant to counsel for Plaintiff Sharon Bridgewater ; if no address has been so designated, service shall be complete upon filing of the documents with this Court.

IT IS FURTHER ORDERED that Defendants shall file and serve any opposition to the issuance of a preliminary injunction and the appointment of a permanent Substitute Custodian over the Substitute Custodianship Defendants, including any declarations, exhibits, memoranda, or other evidence on which they intend to rely, and objections to any evidence submitted by Plaintiff Sharon Bridgwater by no later than 4:30p.m. of the fourth court day prior to the hearing on the preliminary injunction. Such documents may be served by email or fax upon Plaintiff Sharon Bridgwater counsel.

IT IS FURTHER ORDERED that Plaintiff Sharon Bridgewater shall file and serve any reply to Defendants' opposition by no later than 4:30p.m. the second court day prior to the preliminary injunction hearing.

IT IS FURTHER ORDERED that there will be no direct examination of witnesses at the preliminary injunction hearing in this matter. Direct testimony shall be presented in the form of declarations or affidavits. Consistent with Local

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Rule 7-6, the Court in ruling on whether a preliminary injunction shall issue will consider declarations or affidavits that have been filed in a timely manner prior to the preliminary injunction hearing without further need of any party moving such documents into evidence.

IT IS FURTHER ORDERED that the clerk is direct to send Sharon Bridgewaterthat there will be no direct examination owitnesses at the preliminary injunction hearing in this matter. Direct testimony shall be presented in the form of declarations or affidavits. Consistent with Local Rule 7-6, the Court in ruling on whether a preliminary injunction shall issue will consider declarations or affidavits that have been filed in a timely manner prior to the preliminary injunction hearing without further need of any party moving such documents into evidence.

XXV. EXPIRATION

IT IS FURTHER ORDERED that this Order shall expire as to each Defendant fourteen (14) days after entry unless, within such time, the Order for good cause shown, is extended with the consent of the parties, or unless it is further extended pursuant to Federal Rule of Civil Procedure 65.

XXVI.

SERVICE OF THIS ORDER

IT IS FURTHER ORDERED that copies of this Order may be served by any means, including facsimile transmission, email, personal or overnight delivery, or U.S. Mail, by agents and employees of Sharon Bridgewater or any state or federal law enforcement agency or by private process server, upon any financial institution or other entity or person that may have possession, custody, or control of any documents or assets of any Defendant, or that may otherwise be subject to any provision of this Order. Service upon any branch or office of any financial institution shall effect service upon the entire fmancial institution.

SO ORDERED:

Dated:_________this day of_____________2017 at _______a.m./p.m.

____

United States District Court Judge of the Circuit Court

SB