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2020 SEP 25 AM 9:06
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U.S. DISTRICT COURT

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**IN THE UNITED STATES DISTRICT COURT DISTRICT FOR
THE DISTRICT OF UTAH, CENTRAL DIVISION**

RUSSELL G. GREER,
Plaintiff

v.

JOSHUA MOON, publisher of the website
Kiwi Farms, **and KIWI FARMS**, a website
Defendants

**PLAINTIFF’S MOTION FOR
PRELIMINARY INJUNCTION**

Case No.: 2:20-cv-00647

Judge Tena Campbell

Plaintiff Russell G. Greer moves for a preliminary injunction as set out in the *Complaint* and the accompanying *Memorandum in Support*.

As set out in the *Complaint*, Plaintiff brings forth claims of contributory copyright infringement, false light and electronic harassment.

Russell Greer submits that he meets the standards for a preliminary injunction, i.e. he has probable success on the merits, he will be irreparably harmed, others will not be substantially harmed, the public interest will be served, and there is no adequate remedy at law.

Because a preliminary injunction presents no monetary risks to Defendant, Russell Greer requests that bond be set at \$1. *Fed. R. Civ. P. 65(c)*.

For the reasons stated in the accompanying *Memorandum*, Russell Greer prays that the Court grant this motion and preliminarily enjoin Joshua Moon and Kiwi Farms from operating his website during the case, and/or removing every webpage about Greer from Defendant's sites.

DATED: September 13th, 2020

Respectfully submitted,

By:

A handwritten signature in black ink, appearing to be 'R Greer', written over a horizontal line.

Russell Greer
Pro Se Litigant
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