

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

RUSSELL ZINTER, et al;

CIVIL ACTION NO: 5:18-CV-680

*Plaintiffs,*

VS.

CHIEF JOSEPH SALVAGGIO, et al;

*Defendants.*

---

**PLAINTIFFS' MOTION TO EXTEND  
TEMPORARY RESTRAINING ORDER**

NOW COME Plaintiffs, by and through their attorneys, and respectfully seek an Order from this Honorable Court extending the fourteen-day Temporary Restraining Order entered on August 20, 2018. For the reasons set forth in the accompanying Brief in Support, this Motion must be GRANTED.

Respectfully Submitted,

**EXCOLO LAW, PLLC**

/s/ Solomon M. Radner (admission pending)

SOLOMON M. RADNER

Attorney for Plaintiffs

26700 Lahser Rd, Suite 401

Southfield, MI 48033

248-291-9712

sradner@excololaw.com

Dated: August 30, 2018

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

RUSSELL ZINTER, et al;

CIVIL ACTION NO: 5:18-CV-680

*Plaintiffs,*

VS.

CHIEF JOSEPH SALVAGGIO, et al;

*Defendants.*

---

**PLAINTIFFS' BRIEF IN SUPPORT OF THEIR MOTION TO  
EXTEND TEMPORARY RESTRAINING ORDER**

This Court entered a TRO, ECF #22. Plaintiffs hereby incorporate their arguments in ECF #20. Nothing substantial has changed since the TRO was entered. No hearing was held, and the defendants have not responded to the Complaint or TRO. The TRO, ECF #22, pg ID 5 of 6, expires in fourteen days unless extended by the Court or with Defendants' consent. However, Defendants object. For the reasons explained in ECF #22, Plaintiffs request the TRO be extended until a hearing is held.

Respectfully Submitted,

/s/ Solomon M. Radner  
Solomon M. Radner (MI Bar No. P73653)  
Attorney for Plaintiffs  
26700 Lahser Rd, Suite 401  
Southfield, MI 48033  
248-291-9712  
[sradner@excololaw.com](mailto:sradner@excololaw.com)

Dated: August 30, 2018

**PROOF OF SERVICE**

On August 30, 2018, the undersigned served this notice on all known parties of record by e-filing it on this Court's electronic filing system which will send notice to counsel of record for all parties, with the exception of the John Doe Defendants who have yet to be identified.

/s/ Solomon M. Radner