

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

ATLANTIC SHOW PROMOTIONS, INC.,

Plaintiff,

vs.

CASE NO. _____

CITY OF TAMPA, SANDRA W.
FREEDMAN, Individually and
as Mayor of City of Tampa,
and WILHELMINA Y. BOYD,
Individually and as Director
of Tampa Convention Center,

Defendants.

_____ /

**MOTION FOR PRELIMINARY INJUNCTION
AND REQUEST FOR ORAL ARGUMENT**

Atlantic Show Promotions ("Atlantic") seeks to stop the City and Mayor Sandra Freedman from discriminating against Atlantic at the Tampa Convention Center solely because Mayor Freedman dislikes the content of Atlantic's speech. The Mayor's discriminatory policies have already cost Atlantic the loss of two previously-scheduled appearances in April and June, making preliminary injunctive relief particularly imperative well before a final booking date this coming November.

Atlantic makes this motion pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and Rule 4.06, Rules of the United States District Court for the Middle District of Florida. The sponsor of lawful and nonmisleading gun shows in Florida for the past eight years, Atlantic merely calls for a content-neutral, nondiscriminatory admissions policy in a public forum.

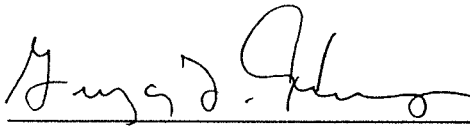
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It seeks a preliminary injunction so that it can begin to recover the momentum and name recognition it has lost. This motion is supported by specific facts shown in the verified complaint and the following memorandum of law addressing each of the injunction factors.

Additionally, Atlantic hereby requests oral argument in this case.

Respectfully Submitted,

HOLLAND & KNIGHT

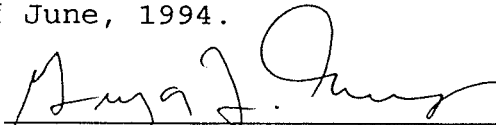


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Attorneys for Atlantic Show
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been forwarded via Hand Deliver to Pam Akin, City Attorney, City Hall, City of Tampa, 315 Kennedy Boulevard, Tampa, Florida, 33602 this 23 day of June, 1994.



Attorney