

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

CAMERON PADGETT,

Plaintiff,

v.

**BOARD OF TRUSTEES OF
MICHIGAN STATE UNIVERSITY,**
In their official capacities,

and

LOU ANNA KIMSEY SIMON,
In her personal and official capacities,

Defendants.

Case No. 1:17-cv-00805-JTN-ESC

Hon. Janet T. Neff

Mag. Ellen S. Carmody

BRISTOW LAW, PLLC

By: Kyle Bristow (P77200)
P.O. Box 381164
Clinton Twp., MI 48038
(P): (248) 838-9934
(E): BristowLaw@gmail.com
Attorney for Cameron Padgett

VARNUM LLP

Bryan R. Walters (P58050)
333 Bridge St. NW
P.O. Box 352
Grand Rapids, MI 49501
(P): (616) 336-6000
(E): brwalters@varnumlaw.com
*Attorney for Board of Trustees of Michigan State
University and Lou Anna Kimsey Simon*

PLAINTIFF'S PRE-MOTION CONFERENCE REQUEST

NOW COMES Cameron Padgett ("Plaintiff"), by and through Attorney Kyle Bristow, and hereby propounds upon Board of Trustees of Michigan State University ("MSU Trustees"), Lou Anna Kimsey Simon ("Simon") (collectively "Defendants"), and this Honorable Court Plaintiff's Pre-Motion Conference Request:

1. LCivR 7.2(a) defines motions for injunctive relief as a type of dispositive motion.

2. Judge Neff Civil Guideline IV(A)(1)(a) requires the filing of a pre-motion conference request prior to a party filing a dispositive motion. This protocol, however, states that it is not applicable for cases for which a magistrate judge has been assigned to them.

3. It appears that Mag. Ellen S. Carmody has been assigned to the case—as evidenced by the case number ending with “ESC”—, so the undersigned counsel filed Plaintiff’s Motion for a Preliminary Injunction on September 10, 2017, without first filing the instant Pre-Motion Conference Request. (Docket No. 8). On September 11, 2017, the undersigned counsel was informed during a phone call with courthouse staff that the instant Pre-Motion Conference Request may need to be filed—which Plaintiff now files for *pro forma* purposes.

4. Plaintiff would like a preliminary injunction whereby Defendants are ordered to permit Plaintiff to rent a conference room or lecture hall on the campus of Michigan State University to host Richard Spencer of the National Policy Institute to discuss Alt-Right philosophy without Plaintiff being required to pay for police protection, posting bond, or providing insurance for the event, and which also requires Defendants to maintain law and order via the use of the Michigan State University Police Department so as to permit the attendees of the event to peacefully assemble and speak.

5. The factual and legal basis for the Court being able to award Plaintiff the requested preliminary injunction are set forth in Plaintiff’s Motion for a Preliminary Injunction. (Docket No. 8).

6. On September 6, 2017, the undersigned attorney emailed Defendants’ attorney a request for concurrence for the requested preliminary injunction. A response from Defendants has yet to be provided.

Respectfully submitted,

BRISTOW LAW, PLLC

/s/ Kyle Bristow

Kyle Bristow, Esq. (P77200)

P.O. Box 381164

Clinton Twp., MI 48038

(P): (248) 838-9934

(E): BristowLaw@gmail.com

Attorney for Cameron Padgett

Dated: September 11, 2017

PROOF OF SERVICE

I, Kyle Bristow, affirm that I am an attorney of record for a party to the above-captioned civil action, and on September 11, 2017, I served a true and accurate copy of this document upon all attorneys of record who have registered to receive service of court filings via the Court's Electronic Filing System by submitting said document to said system.

/s/ Kyle Bristow
Kyle Bristow, Esq. (P77200)
P.O. Box 381164
Clinton Twp., MI 48038
(P): (248) 838-9934
(E): BristowLaw@gmail.com
Attorney for Cameron Padgett

Dated: September 11, 2017