

**IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION**

JOHN W. LICCIONE,
Plaintiff,
v.
RON DESANTIS, et al
Defendants.

Case No.: 26-002751-CI

Division: CIVIL

**PLAINTIFF'S EMERGENCY MOTION FOR TEMPORARY INJUNCTION
UNDER FLA. R. CIV. P. 1.610, REQUESTING (I) IMMEDIATE TEMPORARY
INJUNCTION WITHOUT NOTICE UNDER RULE 1.610(a); (II) TEMPORARY
INJUNCTION WITH NOTICE UNDER RULE 1.610(b) AFTER EMERGENCY
HEARING WITHIN FOURTEEN DAYS; AND (III) WAIVER OF BOND
REQUIREMENT**

Plaintiff John W. Liccione, pro se, respectfully moves this Court under Florida Rule of Civil Procedure 1.610 for entry of a temporary injunction prohibiting Defendants from implementing EOGPCRP2026 / House Bill 1-D in the 2026 congressional election cycle. Plaintiff requests immediate entry of a temporary injunction without notice under Rule 1.610(a); a noticed hearing within fourteen days at which the Court may continue the temporary injunction in force under Rule 1.610(b); and waiver of the bond requirement.

I. INTRODUCTION

1. Plaintiff is a declared Democratic candidate for the United States House of Representatives in Florida's 13th Congressional District, running to unseat incumbent Republican Representative Anna Paulina Luna. On April 29, 2026, the Florida Legislature enacted EOGPCRP2026 as House Bill 1-D — a mid-cycle congressional redistricting plan drawn by Defendant DeSantis's Executive Office of the Governor. On May 4, 2026, Defendant DeSantis signed EOGPCRP2026 into law with immediate effect; the challenged map is now

operative law. The plan removes the South Pinellas barrier-island and bayfront communities from CD-13 and assigns them to a Manatee-anchored CD-16 across Tampa Bay.

2. Plaintiff's contemporaneously filed Verified Complaint alleges that EOGPCRP2026 was drawn with the intent to favor a specific incumbent and to favor a political party in violation of Article III, Section 20(a) of the Florida Constitution, and that EOGPCRP2026 fails to be compact and fails to utilize existing political and geographic boundaries in violation of Article III, Section 20(b). Compl. ¶¶ 1-13, 140-154.
3. The 2026 congressional election calendar is active. Candidate qualifying runs June 8 through June 12, 2026; the primary is August 18, 2026; the general is November 3, 2026. Compl. ¶ 158. Under Florida Administrative Code Rule 1S-2.043, the first mandatory statewide vote-by-mail ballot request information file for the 2026 primary cycle must be transmitted to the Florida Division of Elections sixty days before the August 18, 2026 primary — June 19, 2026. To meet that operational deadline, sixty-seven Florida Supervisors of Elections offices and the Florida Division of Elections must commence implementation of EOGPCRP2026 immediately. Compl. ¶¶ 159-160. Every day the implementation work proceeds is a day of nonrecoverable taxpayer expenditure on a redistricting plan that violates the Florida Constitution.
4. Plaintiff therefore requests immediate entry of a temporary injunction without notice under Rule 1.610(a) to halt that expenditure now, a noticed emergency hearing within fourteen days under Rule 1.610(b) at which the Court may continue the temporary injunction in force pending final judgment, and waiver of the bond requirement under Rule 1.610(b).

II. FACTUAL BACKGROUND

5. Plaintiff incorporates by reference the allegations of the Verified Complaint, ¶¶ 1-169, and summarizes the facts material to this Motion below.
6. **EOGPCRP2026 is Wave Two of a two-stage cross-Tampa-Bay voter-deportation operation.** The 2022 DeSantis congressional map (“Wave One”) used a Hillsborough-anchored CD-14 reaching west across Tampa Bay to seize the first South Pinellas Coalition-voter bloc from CD-13. [REDACTED] (“Wave Two”) uses a Manatee-anchored CD-16 reaching north across Tampa Bay and Boca Ciega Bay into Pinellas County to claw back the Wave-One bloc from current CD-14, snatch the remaining South Pinellas Coalition voters from current CD-13, and deport both blocs into a Manatee-anchored CD-16 — removing those voters from the anti-Luna CD-13 contest where their votes mattered, and vote-wasting them in CD-16 where, against Manatee County's 138,346 Republican voters and 66,283 Democratic voters before the deported Pinellas voters are even added, the deported voters cannot affect the CD-16 outcome either. Compl. ¶¶ 3-4, 73-83, 108-109.
7. **The numerical effect is documented.** Plaintiff's Ballotir voter-impact analysis, drawn from official Florida Division of Elections voter-registration and voter-history files, shows that Wave Two deports 103,359 Pinellas voters from current CD-14 and current CD-13 into new CD-16; deports 63,448 Democratic-led Coalition voters; removes 23,537 more Coalition voters than Republican voters from the anti-Luna CD-13 electoral universe; reduces the Coalition advantage in CD-13 from 74,710 to 51,173; and shifts CD-13's two-party registration from approximately 40.67% Democratic / 59.33% Republican to approximately 38.98% Democratic / 61.02% Republican. Compl. ¶¶ 5, 102-110.
8. **The geography is the apex case for Article III, Section 20(b).** Pinellas is a peninsula on a peninsula, bounded on three sides by water, connected to the mainland by a single narrow

neck, and fronted by a chain of barrier-island municipalities. Its only southern egress is the Sunshine Skyway Bridge — a four-to-seven-mile span across Tampa Bay routinely closed by FDOT during high-wind events. EOGPCRP2026 deports approximately 252,234 Pinellas residents into a district whose own constituents, by reason of geography, do not share the deported communities' active federal-disaster-recovery-oversight needs. Compl. ¶¶ 6, 113-122.

9. **The Florida Supreme Court has already condemned the same Tampa Bay crossing technique as a partisan redistricting tool.** In *League of Women Voters of Florida v. Detzner*, 172 So. 3d 363 (Fla. 2015) (“*Apportionment VII*”), the Court held with specific reference to the Tampa Bay crossing that “Districts 13 and 14 must be redrawn to avoid crossing Tampa Bay,” *id.* at 408–09, and tied that directional holding to the Court's separate finding that the underlying configuration was drawn with unconstitutional intent to favor the Republican Party and to make CD-13 “more favorable to the Republican Party,” *id.* at 407. EOGPCRP2026 crosses Tampa Bay again, in the inverse direction, with a Manatee-anchored CD-16. Compl. ¶¶ 9, 49, 121-122, 153.

III. LEGAL STANDARD

10. Florida Rule of Civil Procedure 1.610 authorizes entry of a temporary injunction. The same four substantive elements govern entry under both subsections of the rule: (1) a substantial likelihood of success on the merits; (2) lack of an adequate remedy at law; (3) irreparable harm absent the injunction; and (4) that the injunction will serve the public interest. *City of Jacksonville v. Naegele Outdoor Adver. Co.*, 634 So. 2d 750, 754 (Fla. 1st DCA 1994), *approved*, 659 So. 2d 1046, 1047 (Fla. 1995); *Jouvence Ctr. for Advanced Health, LLC v. Jouvence Rejuvenation Ctrs., LLC*, 14 So. 3d 1097, 1099 (Fla. 4th DCA 2009). The trial

court must make “clear, definite, and unequivocally sufficient factual findings” supporting each element. *Wade v. Brown*, 928 So. 2d 1260, 1262 (Fla. 4th DCA 2006).

11. Rule 1.610 has two procedural modes for entering a temporary injunction:

12. **Without notice — Rule 1.610(a).** A temporary injunction may be granted without written or oral notice to the adverse party if (A) it appears from the specific facts shown by affidavit or verified pleading that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition; and (B) the movant certifies in writing any efforts that have been made to give notice and the reasons why notice should not be required.

13. **With notice — Rule 1.610(b).** A temporary injunction may be granted after a noticed hearing on the four-element test. Bond is set by the court “in an amount the court deems proper, conditioned for the payment of costs and damages sustained by the adverse party if the adverse party is wrongfully enjoined.”

14. Plaintiff satisfies the four-element substantive test, the additional showing required for entry without notice under Rule 1.610(a), and the basis for waiver of the bond requirement under Rule 1.610(b).

IV. PLAINTIFF SATISFIES ALL FOUR ELEMENTS

A. Substantial Likelihood of Success on the Merits — Article III, Section 20(a)

15. Plaintiff is substantially likely to succeed on Count I of the Verified Complaint, which alleges that EOGPCRP2026 violates both prongs of Article III, Section 20(a) — the incumbent-protection prong and the partisan-favoritism prong. Article III, Section 20(a) provides: “No apportionment plan or individual district shall be drawn with the intent to favor or disfavor a political party or an incumbent.”

16. **Incumbent-protection prong.** The protected incumbent is Republican Representative Anna Paulina Luna. The injured challenger is Plaintiff. EOGPCRP2026 protects Luna by removing from CD-13 the South Pinellas barrier-island and bayfront communities most likely to vote against her, and by completing through Wave Two the cross-Bay voter-deportation operation begun in Wave One. Compl. ¶¶ 142-144. EOGPCRP2026 protects Luna from Plaintiff specifically by removing the communities where Plaintiff has campaign history, voter relationships, name recognition, and political identity — including Gulfport, where Plaintiff lived from January 2023 through July 2025 and ran for Mayor in March 2025. Compl. ¶ 144.
17. **Partisan-favoritism prong.** EOGPCRP2026 favors the Republican Party by removing 23,537 more Coalition voters than Republican voters from CD-13, reducing the Coalition advantage in CD-13 from 74,710 to 51,173, and shifting CD-13's two-party registration from approximately 40.67% Democratic / 59.33% Republican to approximately 38.98% Democratic / 61.02% Republican. Compl. ¶ 145.
18. **Apportionment VII intent framework.** The Florida Supreme Court has held that intent under Section 20(a) may be proved by direct evidence, by circumstantial evidence, or by inference from a map's failure to comply with tier-two standards when reasonable alternative configurations would have done so. *Apportionment VII*, 172 So. 3d at 401–03. The Section 20(b) defects alleged in Count II of the Verified Complaint — the failure of compactness in CD-16, the failure to utilize the Pinellas County line and Pinellas municipal boundaries, the failure to utilize Tampa Bay and Boca Ciega Bay as existing geographic boundaries, and the fracture of the BIG-C barrier-island municipal community of interest — are themselves attendant-circumstances evidence of Section 20(a) intent. Compl. ¶ 146. Same Pinellas; same

Tampa Bay; same governor as in *Apportionment VII*; same partisan effect; inverse cross-Bay direction. Compl. ¶ 49.

19. **Callais does not displace Plaintiff's claims.** Plaintiff seeks no federal partisan-gerrymandering remedy and no race-based Voting Rights Act remedy. Plaintiff's claims arise exclusively under Florida's independent state-constitutional commands. *Louisiana v. Callais*, Nos. 24-109 and 24-110, 608 U.S. ____ (Apr. 29, 2026), addressed race-conscious districting and the interaction between the Voting Rights Act and the Equal Protection Clause; it did not authorize partisan favoritism, did not authorize incumbent-protection gerrymandering, and did not repeal Article III, Section 20 of the Florida Constitution. Compl. ¶¶ 10, 51-56, 147.

B. Substantial Likelihood of Success on the Merits — Article III, Section 20(b)

20. Plaintiff is also substantially likely to succeed on Count II, which alleges that EOGPCRP2026 violates Article III, Section 20(b)'s requirement that congressional districts be contiguous and, where feasible, compact and utilize existing political and geographic boundaries.
21. EOGPCRP2026 fails to be compact in CD-16, fails to utilize the Pinellas County line and Pinellas municipal boundaries, fails to utilize Tampa Bay and Boca Ciega Bay as the existing geographic boundaries that they are, and fractures the BIG-C barrier-island municipal community of interest — an organized, eleven-municipality governmental council incorporated in 1990 that coordinates federal advocacy on beach preservation, storm-surge recovery, FEMA recovery, and related coastal concerns. Compl. ¶¶ 132-139, 152.
22. The Florida Supreme Court applied Section 20(b) to this same geography in *Apportionment VII*, holding that “Districts 13 and 14 must be redrawn to avoid crossing Tampa Bay.” 172 So. 3d at 408–09. EOGPCRP2026 crosses Tampa Bay again, in the inverse direction, with a Manatee-anchored CD-16 reaching north into Pinellas to deport South Pinellas voters across

the same single Skyway crossing the Florida Supreme Court condemned eleven years ago. Compl. ¶ 153.

C. Substantial Threat of Irreparable Harm

23. Election injury cannot be fully remedied after an election occurs. Compl. ¶ 155. Plaintiff's candidacy is active now. Plaintiff's campaign strategy, voter outreach, fundraising, ballot-access planning, message development, and voter relationships are being distorted now by the threatened implementation of EOGPCRP2026. Compl. ¶ 156.
24. The injury to South Pinellas Coalition voters is two-sided. Those voters cannot affect the CD-13 contest because EOGPCRP2026 has removed them from CD-13 entirely, and they cannot affect the CD-16 outcome because Manatee County alone has 138,346 Republican voters and 66,283 Democratic voters before the deported Pinellas voters are even added — a receiving-district structure designed to vote-waste the deported voters. The result is functional disenfranchisement on both sides of the deportation. Compl. ¶¶ 108-109.
25. The harm is occurring now. EOGPCRP2026 took immediate effect upon Defendant DeSantis's signing on May 4, 2026; implementation is no longer prospective but is operative law. Defendant Marcus's Pinellas-situs implementation of EOGPCRP2026 — including voter reassignment, election-definition build, precinct-split handling, ballot-style generation, voter notifications under sections 98.0981 and 101.001, Florida Statutes, congressional-candidate qualifying processing, and poll-worker training — is now legally compelled if the map is not enjoined. Compl. ¶ 160. Once an election is administered under EOGPCRP2026, the harm cannot be undone. Compl. ¶ 162.

D. No Adequate Remedy at Law

26. No money damages can compensate for the loss of Plaintiff's opportunity to campaign in a constitutional district, the loss to South Pinellas voters of representation in a Pinellas-

centered congressional district, or the loss of the existing organized BIG-C municipal coordination structure as a unified federal-advocacy voice. Compl. ¶ 161. Declaratory relief alone, without an injunction restraining implementation, will not prevent Defendants from administering the 2026 elections under an unconstitutional map. The remedy at law is inadequate.

E. Public Interest and Balance of Equities Favor the Injunction

27. The public interest favors a temporary injunction. The public has a substantial interest in constitutional congressional maps; in geographic-coherent congressional representation, particularly in the most hurricane-exposed state in the Union; in Article III, Section 20's geographic-boundary commands being enforced at the point of their most concentrated application — Pinellas County; in unified federal-disaster-recovery advocacy for affected communities; and in maintaining existing organized municipal communities of interest, including BIG-C, as coherent units for federal-representation purposes. Compl. ¶¶ 163-167. Defendants have no legitimate interest in enforcing an unconstitutional map, in protecting an incumbent through redistricting, or in fracturing existing organized communities of interest for partisan purposes. Compl. ¶ 168.

28. The balance of equities decisively favors Plaintiff. The injunction Plaintiff seeks does not impose costs on Defendants — it spares them and the State of Florida the cost of emergency mid-cycle implementation across the period from EOGPCRP2026's May 4, 2026 immediate-effect signing to the June 19, 2026 vote-by-mail operational deadline. That forty-six-day window forces sixty-seven Florida Supervisors of Elections offices and the Florida Division of Elections into emergency operational posture: voter reassignment, GIS boundary file processing, election-definition rebuilds, ballot-style regeneration, precinct-split handling, voter notifications under sections 98.0981 and 101.001, Florida Statutes, poll-worker

retraining, polling-place reconfiguration, and vote-by-mail field reconfiguration — work that requires overtime, contractor-augmented staffing, compressed quality-assurance, and weekend operations across sixty-seven county offices and the State agency. Enjoining EOGPCRP2026 before those costs are incurred protects the public fisc statewide. Conversely, allowing the State to spend taxpayer money implementing a map this Court is likely to declare unconstitutional inflicts statewide administrative and financial harm that cannot be recovered after declaratory and injunctive relief issue.

29. The modest cost of restoring a Pinellas-centered CD-13 is far outweighed by the constitutional injury of conducting the 2026 congressional elections under EOGPCRP2026. Compl. ¶ 169.

V. BOND SHOULD BE WAIVED

30. Florida Rule of Civil Procedure 1.610(b) commits the bond requirement to the trial court's discretion — “an amount the court deems proper, conditioned for the payment of costs and damages sustained by the adverse party if the adverse party is wrongfully enjoined.” Three independent grounds support waiver of bond here.

A. The Injunction Confers, Rather than Imposes, Fiscal Benefit on the Enjoined Parties

31. The traditional rationale for an injunction bond — protecting the enjoined party from monetary loss caused by an erroneously-issued injunction — is inverted on these facts. Defendants and the State of Florida are financially better off with the injunction than without it during the pendency of this action.
32. EOGPCRP2026 was enacted on April 29, 2026, and signed into law by Defendant DeSantis with immediate effect on May 4, 2026. The Florida Administrative Code Rule 1S-2.043 vote-by-mail operational deadline is June 19, 2026 — approximately forty-six days from

immediate-effect signing to operational deadline. Mid-cycle implementation on that compressed timeline forces every Florida Supervisor of Elections office and the Florida Division of Elections into emergency operational posture: voter reassignment under sections 98.0981 and 101.001, Florida Statutes; GIS boundary file processing; election-definition rebuilds; ballot-style regeneration; precinct-split handling; voter notifications; poll-worker retraining; polling-place reconfiguration; and vote-by-mail field reconfiguration. Doing that work on a forty-six-day cycle requires overtime, contractor-augmented staffing, compressed quality-assurance, and weekend operations across sixty-seven county offices and the Florida Division of Elections.

33. Enjoining EOGPCRP2026 before those costs are incurred protects the public fisc statewide.

The injunction Plaintiff seeks does not require Defendants to spend money — it spares Defendants and the sixty-seven Supervisors of Elections from spending taxpayer money on emergency mid-cycle implementation of a map that is the subject of pending constitutional challenge. Bond is therefore not merely waivable but affirmatively unwarranted because the injunction confers, rather than imposes, fiscal benefit on the enjoined parties.

B. Government-Action Context

34. Rule 1.610(b) itself recognizes that injunctions involving the State warrant special treatment of bond, providing that “[w]hen any injunction is issued on the pleading of a municipality or the state or any officer, agency, or political subdivision thereof, the court may require or dispense with a bond, with or without surety.” Although this textual provision addresses cases where the State is the movant, it reflects the broader principle that the bond requirement is committed to the trial court's discretion and that the calculus differs materially when state actors are parties to the injunction.

35. All three Defendants are sued in their official capacities as state and county officials. The injunction prohibits these officials from implementing an unconstitutional redistricting plan in their official capacities; it does not enjoin them from any commercial activity, transactional conduct, or quantifiable revenue-generating function. The traditional bond rationale — protecting against quantifiable monetary loss to the enjoined party — does not apply.

C. Public-Interest Exception

36. Florida courts recognize that bond may be reduced or waived where the injunction protects constitutional rights and serves the public interest. *See, e.g., Planned Parenthood of Sw. & Cent. Fla. v. State*, 384 So. 3d 67, 73 n.4 (Fla. 2024) (recognizing public interest as element of injunction analysis). Plaintiff seeks to enforce Article III, Section 20 of the Florida Constitution — a constitutional command ratified by approximately 63% of Florida voters in 2010 — against state and county officials. The constitutional plaintiff in election and redistricting cases vindicates not merely private interests but the public's interest in lawful, constitutional government.

37. Setting a substantial bond in this case would erect a wealth-based barrier to constitutional enforcement, deterring pro se candidate-plaintiffs from challenging redistricting plans even where, as here, the violation is patent. That outcome is irreconcilable with the public interest in enforcing Article III, Section 20.

38. For all three reasons — fiscal-benefit, government-action context, and the public-interest function of this litigation — the Court should dispense with the bond requirement under Rule 1.610(b).

**VI. IMMEDIATE TEMPORARY INJUNCTION WITHOUT NOTICE
IS WARRANTED UNDER RULE 1.610(a)**

39. Plaintiff requests immediate entry of a temporary injunction without notice to the adverse parties under Rule 1.610(a), pending the noticed hearing requested in Section VII below. Rule 1.610(a) requires (A) specific facts shown by affidavit or verified pleading that immediate and irreparable injury, loss, or damage will result before the adverse parties can be heard in opposition; and (B) certification of any efforts made to give notice and the reasons notice should not be required. Plaintiff satisfies both requirements.

A. The Verified Complaint Establishes Immediate and Irreparable Injury Before Defendants Can Be Heard in Opposition

40. The Verified Complaint, executed under Section 92.525, Florida Statutes, is a verified pleading sufficient to support entry of a temporary injunction without notice under Rule 1.610(a). The Complaint pleads — with specific factual detail — the imminent implementation of EOGPCRP2026 by sixty-seven Florida Supervisors of Elections offices and the Florida Division of Elections under a forty-six-day compressed timeline running from EOGPCRP2026's May 4, 2026 immediate-effect signing to the June 19, 2026 vote-by-mail operational deadline, the active 2026 candidate qualifying period beginning June 8, 2026, and the active distortion of Plaintiff's campaign operations now. Compl. ¶¶ 156, 158-160.

41. The injury is occurring now. EOGPCRP2026 took immediate effect upon Defendant DeSantis's signing on May 4, 2026; the challenged map is operative law. Implementation work to meet the June 19, 2026 vote-by-mail operational deadline must commence within days, not on the eve of the deadline. Defendants' implementation of EOGPCRP2026 is therefore present-tense and legally compelled, not prospective or anticipated. Each day the implementation work proceeds, the State of Florida commits nonrecoverable taxpayer

expenditure to a redistricting plan that violates Article III, Section 20 of the Florida Constitution.

42. Defendants cannot be served, retain counsel, file an opposition, and appear at a hearing within a timeframe that meaningfully precedes the implementation expenditure this injunction is designed to halt. Service on the Governor, the Secretary of State, and a county Supervisor of Elections takes time. By the time Defendants could be heard in opposition under the ordinary noticed-motion timeline, substantial implementation expenditure will have already been incurred and substantial implementation work will have already been completed. The harm — wasted public funds and election-administration setup under an unconstitutional map — accrues every day of delay.

B. Certification of Notice Efforts and Reasons Notice Should Not Be Required

43. This action is being filed contemporaneously with this Motion. Defendants have not yet been served and have not yet appeared. Plaintiff has not provided informal pre-filing notice of this Motion to Defendants for two reasons. First, informal pre-filing notice is not required by any rule of procedure; Rule 1.610(a) requires only certification of any efforts made and the reasons notice should not be required. Second, providing informal pre-filing notice would risk Defendants accelerating implementation activity to moot the Motion before the Court can rule, which would defeat the purpose of the Motion and inflict the very public-fisc and constitutional injury the Motion seeks to prevent.

44. Plaintiff respectfully certifies under Rule 1.610(a)(B) that no efforts to give notice in advance of filing have been made, and that notice should not be required for entry of immediate relief because (1) Defendants' implementation of EOGPCRP2026 is occurring now, and (2) any noticed-motion timeline forces the State of Florida to incur substantial nonrecoverable

taxpayer expenditure on implementation of an unconstitutional plan during the service window — expenditure the immediate injunction is designed to prevent.

45. Plaintiff will serve this Motion concurrently with service of the Verified Complaint, Summons, and other case-opening papers on each Defendant in his or her official capacity through the methods authorized for service on State and County officials. Plaintiff will set the noticed hearing under Rule 1.610(b) within fourteen days of filing and will serve notice of that hearing on Defendants concurrently with service of the case-opening papers, providing Defendants full opportunity to be heard at the noticed hearing.

VII. NOTICED HEARING WITHIN FOURTEEN DAYS UNDER RULE 1.610(b)

46. Plaintiff respectfully requests that the Court set a noticed emergency hearing on the temporary injunction under Rule 1.610(b) at the earliest available date and in any event within fourteen days of filing of this Motion. Setting the hearing later than fourteen days will materially defeat the public-fisc purpose of the immediate injunction by allowing the State to commit further nonrecoverable taxpayer expenditure on EOGPCRP2026 implementation during the additional delay. The 2026 congressional candidate qualifying period also begins June 8, 2026, and a noticed hearing held after qualifying has begun under EOGPCRP2026 boundaries would force qualifying decisions and ballot-access planning under an unconstitutional map.
47. **Issues to be resolved at the noticed hearing.** Whether to continue the temporary injunction in force under Rule 1.610(b) restraining Defendants from implementing EOGPCRP2026 in the 2026 congressional election cycle pending final judgment, and whether to dispense with the bond requirement under Rule 1.610(b).

48. **Time needed for each party's presentation.** Plaintiff respectfully estimates that two (2) hours will be required for full argument, with each party allotted approximately equal time and additional time reserved for the Court's questions.

VIII. CONCLUSION AND SPECIFIC RELIEF REQUESTED

49. For the foregoing reasons, Plaintiff respectfully requests that this Court:

- A. Enter a temporary injunction without notice** under Florida Rule of Civil Procedure 1.610(a), effective immediately upon entry, prohibiting Defendant DeSantis, in his official capacity as Governor; Defendant Byrd, in his official capacity as Secretary of State and Chief Elections Officer; and Defendant Marcus, in her official capacity as Pinellas County Supervisor of Elections, from giving effect to, implementing, or enforcing EOGPCRP2026 in any congressional election or election-administration activity, pending the noticed hearing requested in paragraph B below;
- B. Set a noticed hearing under Rule 1.610(b)** at the earliest available date and in any event within fourteen days of filing of this Motion, at which the Court may continue the temporary injunction in force pending final judgment;
- C. Dispense with the bond requirement** under Florida Rule of Civil Procedure 1.610(b);
- D. After the noticed hearing under Rule 1.610(b), enter a temporary injunction** prohibiting Defendants, in their official capacities, from giving effect to, implementing, or enforcing EOGPCRP2026 — including without limitation the implementation acts identified in the Verified Complaint at ¶¶ 27, 160 and in Plaintiff's Prayer for Relief at items E through G — pending final judgment in this action;

- E. Retain jurisdiction to enforce the foregoing relief and to proceed to final judgment on Plaintiff's claims; and
- F. Grant such other and further relief as this Court deems just and proper.

Dated May 5, 2026

/s/ John W. Liccione
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 5th, 2026, a true and correct copy of the foregoing was filed with the Clerk of the Court using the Florida Courts E-Filing Portal and will be served on Defendants concurrently with service of the Verified Complaint and Summons through the methods authorized for service on State and County officials.

/s/ John W. Liccione
John William Liccione