

**COUNT I**

**Temporary Injunction without Notice pursuant to Florida Rules of Civil Procedure**

**1.610**

48. The Plaintiffs reallege paragraphs 10-47 as set forth herein in full.

Based upon the above facts Plaintiffs alleges that it has no adequate remedy at law.

49. The harm, if any, that would result to Defendants if this injunction is granted would be relatively insignificant compared to the immediate and irreparable injury, loss and damage that Plaintiff would suffer in the event that this injunction is not granted.

50. Plaintiff seeks an injunction to preserve the status quo until a final hearing can be had in this matter.

51. Plaintiffs requests that a temporary injunction be issued without notice to Defendants. The Plaintiffs, through their attorney/agent has made numerous attempts to notify the Defendants of this action. Plaintiffs' states that the Notice should not be required because in addition to suffering immediate and irreparable harm if this petition is not granted. To require the Plaintiffs to give notice could result in injury to the parties given the contentious nature of the parties. Unless the current status quo is maintained the Plaintiffs will not be able to conduct church services at either property. The continued confrontation between the parties may result in physical injury to the Plaintiff's agents or to the Defendants. The Plaintiffs request that the injunction be entered without notice for the above reasons.

52. It should be 2313 N. G. St is vacant and the Defendants seek to sell or lease the said property. This injunction does not seek to enjoin any members of Westside from

attending church services and only seeks to enjoin Defendants and any of his agents from asserting they have authority to control the property of the Plaintiffs located at 51 Marshall Lane, 2313 North G Street and 1100 W. Yonge Street, including any vehicles that the Plaintiffs has titled in its name.

53. The Petitioner alleges that based on the facts contained herein and attached documents, it has a substantial likelihood of success.

54. On the merits the Petition should be granted given consideration of the public interest.

55. On final trial on the merits, that the Court should enter a permanent injunction to enjoin Defendants and/or his agents for removing church property.

55. Plaintiffs ask the Court to waive requirement of a bond because: No damages will be sustained by the enjoined party, Defendant Watts is a former Pastor and does not preside over the Plaintiff's religious entity; Defendant Watts is not due any compensation and given the possibility of physical confrontation between the parties, this injunction will also be entered to prevent physical injury. If the Court is inclined to require the Plaintiffs to enter a bond, let the bond be no more than \$10,000.00 dollars.

WHEREFORE, Plaintiffs respectfully request this Court to 1) issue a temporary injunction issue without notice to Defendants, enjoining Defendants, Defendant's Officers, agents, servants, employees, successors, and assigns, and attorney from directly or indirectly preventing NFJ and CHURCH from gaining access to all of its properties including 2313, North G Street, 1100 West YONGE Street, and 51 Marshall Lane; 2) Waive the bond requirement as it relates to this mater and if the court is inclined to require the Petitioner to enter a bond, let the bond be no more than \$10,000,