

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

JOHN PARKS TROWBRIDGE, JR.,)
)
 Plaintiff,) CIVIL NO. _____
 v.)
)
 UNITED STATES OF AMERICA,)
)
 Defendant.)
 _____)

**PLAINTIFF’S APPLICATION FOR TEMPORARY RESTRAINING ORDER AND
ORDER TO SHOW CAUSE
WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1(a), Plaintiff John Parks Trowbridge, Jr. hereby applies to this Court for a temporary restraining order (“TRO”). In support of this motion, Plaintiff states as follows:

1. Plaintiff brings this action to restrain Defendant United States of America from using any 28 U.S.C. § 3002(8) judgment obtained from a United States District Court purporting to possess and exercise territorial jurisdiction in Tyler County, Texas, to enforce its liens against and foreclose upon and sell Plaintiff’s real property in Tyler County, Texas, until such time as this Court issues a judgment declaring (a) whether the territorial jurisdiction of United States District Courts is co-extensive with the territorial legislative power of Congress or extends to Tyler County, Texas, and (b) Plaintiff’s right to the Real Property in respect thereof.

2. Plaintiff demanded six months ago that Defendant disclose the constitutional authority that gives the United States District Court of first instance the capacity to take jurisdiction and enter a 28 U.S.C. § 3002(8) judgment in Tyler County, Texas, but Defendant failed to respond to said demand, thereafter likewise failed to oppose Plaintiff’s motion to dismiss with prejudice, and never addressed the subject matter of either aforesaid filing.

3. Defendant now has obtained from the United States District Court of first instance, two 28 U.S.C. § 3002(8) judgments, specifically a memorandum order and a final judgment, both entered on March 3, 2016, and threatens to use either or both to enforce its liens against and foreclose upon and sell Plaintiff's aforesaid real property as soon as March 18, 2016.

3. Plaintiff therefore, to preserve the status quo, seeks an order:

a. Temporarily restraining and enjoining, for 14 days, Defendant from using either the aforesaid memorandum order or final judgment as authority to enforce its liens against and foreclose upon and sell Plaintiff's real property in Tyler County, Texas; and

b. Requiring Defendant to show cause why this Court should not issue a preliminary injunction extending such temporary relief, and thereafter a permanent injunction, pending this Court's resolution of said controversy re extent of territorial jurisdiction, and judgment declaring Plaintiff's right to property in Tyler County, Texas.

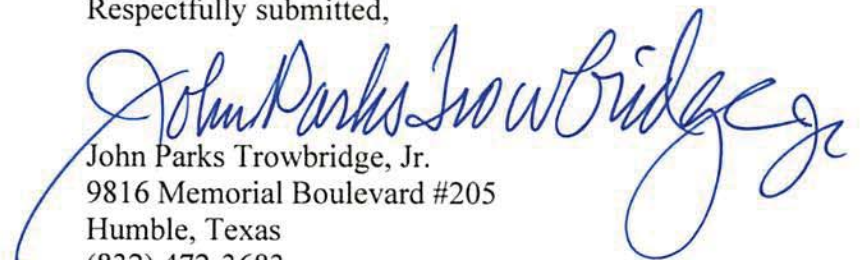
4. Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1(a)(1): Plaintiff has provided actual notice to Defendant concurrent with the making of this application, and a copy of all pleadings and papers filed in this action to date; and a certificate pursuant to Local Civil Rule 65.1(a)(1) accompanies this motion.

5. A memorandum in support of TRO and proposed TRO are filed concurrently.

WHEREFORE, Plaintiff respectfully requests that the Court grant this motion by entering the proposed TRO.

Date: March 14, 2016

Respectfully submitted,

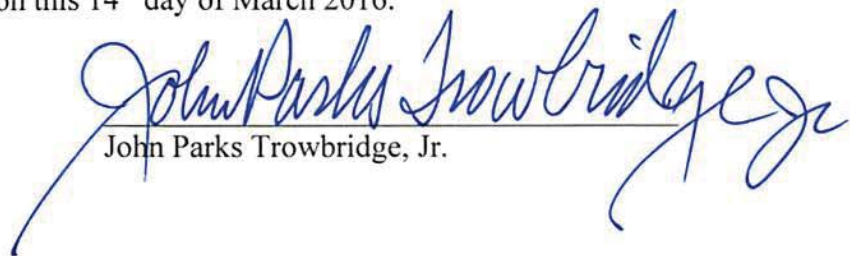

John Parks Trowbridge, Jr.
9816 Memorial Boulevard #205
Humble, Texas
(832) 472-3683

CERTIFICATE OF NOTICE

Pursuant to Local Civil Rule 65.1(a) as to actual notice to defendant United States of America ("Defendant") of the time of making the appended application for temporary restraining order, the undersigned, John Parks Trowbridge, Jr. ("Trowbridge") hereby certifies that Trowbridge on March 14, 2016, furnished Defendant with the same by telephonic conversation; and as to a copy of all pleadings and papers to be filed in this action, by Federal Express for delivery Tuesday morning, March 15, 2016.

Upon making the application March 15, 2016, Trowbridge shall cause to be served on Defendant immediately thereafter the summons and a copy of all pleadings and papers filed in this action as of that time, and thereupon cause to be filed in the Court on the same day a return of service.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 14th day of March 2016.


John Parks Trowbridge, Jr.