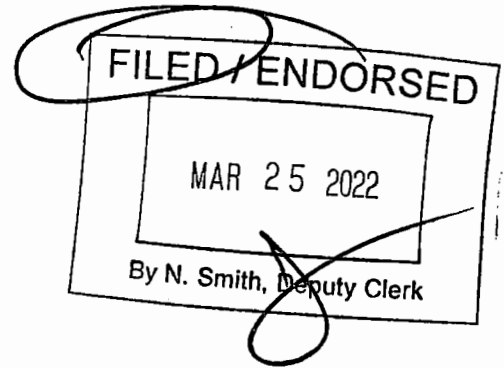


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6 *Service Employees International Union Local 1000*



7
8 SUPERIOR COURT OF CALIFORNIA
9 COUNTY OF SACRAMENTO – GORDON D. SCHABER COURTHOUSE
10

11 WILLIAM HALL,
12 Plaintiff and Petitioner,
13 v.
14 RICHARD LOUIS BROWN,
15 Defendant and Respondent,
16 and

17 UNION OF CALIFORNIA STATE
WORKERS, a nonprofit mutual benefit
corporation, dba SERVICE EMPLOYEES
INTERNATIONAL UNION LOCAL 1000,
18 Party in Interest,

19 and
20 SERVICE EMPLOYEES INTERNATIONAL
UNION,
Party in Interest.

21 SERVICE EMPLOYEES INTERNATIONAL
UNION LOCAL 1000,
22 Cross-Complainant,

23 v.
24 RICHARD LOUIS BROWN and DOES 1
through 100,
25 Cross-Defendant.

CASE NO. 34-2022-80003793-CU-WM-GDS

Assigned to Hon. Steven M. Gevercer
Department 27

~~PROPOSED~~ ORDER GRANTING
PRELIMINARY INJUNCTION

Complaint Filed: January 12, 2022
Cross-Complaint Filed: March 8, 2022
Trial Date: None

Hearing Date: March 25, 2022
Time: 10:00 a.m.
Dept. 27

1 This matter is before the Court upon an order to show cause re: preliminary injunction
2 issued on March 10, 2022, in response to the Cross-Complaint and Ex Parte Application of
3 Cross-Complainant Service Employees International Union Local 1000 ("Local 1000"). It
4 appearing to the satisfaction of the Court that this is a proper case for granting a preliminary
5 injunction; now, therefore:

6 IT IS HEREBY ORDERED that pending final disposition of this action Cross-Defendant
7 Richard Louis Brown and all persons acting in concert and participation with him, are enjoined
8 from directly or indirectly engaging in or performing any or all of the following acts:

- 9 a. entering Local 1000's premises;
- 10 b. failing and/or refusing to leave Local 1000's premises;
- 11 c. destroying Local 1000's property;
- 12 d. retaining and/or using Local 1000's property;
- 13 e. failing and/or refusing to return Local 1000's property;
- 14 f. holding himself out as the authorized president or as otherwise authorized to speak or
15 act on behalf of Local 1000;
- 16 g. exercising any powers of the Local 1000 President; and
- 17 h. obstructing or interfering in any way with the conduct of Local 1000's operations and
18 affairs.

19 For purposes of this order, these definitions apply:

20 (1) "Holding himself out as the authorized president or otherwise authorized to speak or
21 act on behalf of Local 1000" includes a statement by Brown that he is the "president" of Local
22 1000 in any communication made during the pendency of the internal union proceedings arising
23 from his suspension from office that does not disclose Brown's suspension from the presidency.

24 (2) "Local 1000's property" includes all communications, information, or property made
25 or acquired by an officer or employee of Local 1000 in the course of carrying out his or her
26 duties on behalf of Local 1000, including membership and employee lists and other files used to
27 run Local 1000.

1 Cross-Complainant is to furnish an undertaking in the sum of \$20,000 by
2 close of business on March 30, 2022.

3
4 DATED: 3/25/2022



Steven M. Gevers
HONORABLE STEVEN M. GEVERCER
JUDGE OF THE SUPERIOR COURT