

IN THE SUPREME COURT)	
)	
Action No. 22-008)	
)	
Samuel C. Robinson)	
PLAINTIFF)	PLAINTIFF’S MOTION
)	FOR EXPEDITED HEARING
Versus)	
)	
David R. Bass, and)	
Bass for Student Body President Campaign,)	
DEFENDANT)	

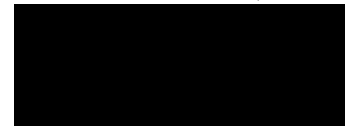
MOTION

1. Pursuant to R. 34, a party may “petition the Court to take certain actions outside complaint or answer by means of motion”.
2. This court has in past granted requests for expedited proceedings, see *Levy v. Ruffin* 1 S.S.C. 5 (1971). In this case, the Court took action to expedite the hearing by waiving certain arguments.
3. We assert that the electoral fundamentals are shaped by Defendant’s flagrant and notorious disinformation campaign which amounts to coercion and undue influence. Denial of an expedited hearing request would cause substantive harm to the electoral process and the rights of the Plaintiff, a candidate for Student Body President. The whole of Defendant’s campaign benefits from the undue influence exerted by Defendant upon voters in a manner which unduly increases Defendant’s ability to satisfy the requirements of a candidate for the office of Student Body President. Thus, the continued operation of Defendant’s campaign necessarily harms the rights of Plaintiff by continuing to place Plaintiff at a competitive disadvantage compared to Defendant. Specifically, the operation of the campaign in the time intervening between the filing of the complaint and the trial of that action will continue to see the Defendant benefit from their coercive actions and thus continue to increase the competitive disadvantage of Plaintiff.
4. The Order of this Court issued on or about the 1st of February, 2023 grants seven (7) days for Defendant to prepare an Answer. During such time, Defendant maintains a platform for communication and messaging built with tactics alleged to be in violation of the Student Constitution. Defendant holds no incentive to Answer the Plaintiff’s Complaint in a timely manner, but continues to fundamentally shape the narrative of this election.

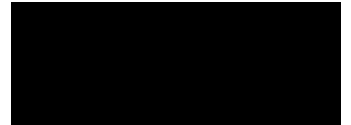
5. The expedited hearing as requested in this motion would protect Plaintiff's rights as a candidate to a fair election in compliance with the body of student law and minimize the potential for damage to electoral climate created by the Bass for Student Body President Campaign. Violations of electoral law which occur earlier in an election cycle are viewed by this Court as more significant and a greater cause for relief, per *Klein v. Morgan* 1 S.S.C. 212 (2008).
6. Plaintiff moves for an expedited hearing or other extraordinary writ such that:
 - a. The Court amend the summons requiring the Defendant to provide a response within 4 calendar days of the original service of the summons.

I do affirm that I have read in full the foregoing complaint and that the allegations contained therein are true to the best of my knowledge and belief.

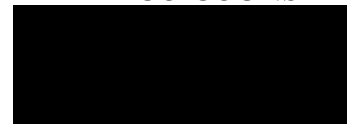
/s/ Samuel C. Robinson
PLAINTIFF



/s/ Andrew H. Gary
CAMPAIGN COUNSEL



/s/ Callie E. Stevens
CO-COUNSEL



/s/ Christopher C. McClanahan
DEPUTY COUNSEL



Filed this the 3rd day of February, 2023, at 12:10 a.m.