

IN THE CHANCERY COURT FOR ROBERTSON COUNTY, TENNESSEE

WINGNUTS AVIATION, LLC )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 SPRINGFIELD, TENNESSEE; ROBERTSON )  
 COUNTY, TENNESSEE; )  
 SPRINGFIELD/ROBERTSON COUNTY )  
 JOINT AIRPORT BOARD; HENRY "HAWK" )  
 RUTH; AND KRISTIN BUTTKE, )  
 Defendants. )

No. CH19-CV-6

Jury Requested

FILED  
CLERK & MASTER ROBERTSON CO. TN  
JAN 07 2019  
AT \_\_\_\_\_ O'CLOCK \_\_\_\_\_ M  
BY ROSEMARY E. PHILLIPS

MOTION FOR TEMPORARY INJUNCTION

Plaintiff, Wingnuts Aviation, LLC ("Wingnuts"), by counsel and pursuant to Rule 65.04 of the Tennessee Rules of Civil Procedure, moves this Court for a temporary injunction, enjoining and restraining Defendant Springfield/Robertson County Joint Airport Board ("the Board") from denying Wingnuts' right to renew the Lease and F.B.O Management Agreement ("the Agreement"), entered into by and between Wingnuts and the Board wherein Wingnuts serves as the Fixed Base Operator for the Springfield/Robertson County Airport. Additionally, Wingnuts requests that the Court enter an injunction as permitted by Tennessee's Open Meetings Act, Tenn. Code Ann. § 8-44-106.

As grounds for this Motion, as more fully set forth in Wingnuts' Verified Complaint, Petition for Writ of Certiorari and Injunctive Relief, Wingnuts would show the Court as follows:

1. Wingnuts will suffer irreparable harm;
2. The issuance of the requested injunctive relief will not cause harm to the Board;
3. Wingnuts is likely to succeed on the merits; and

4. The public interest is served by granting the injunctive relief.

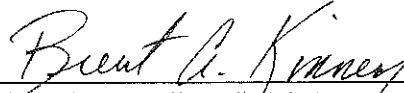
In addition, Wingnuts submits a Memorandum of Law supporting its Motion for Temporary Injunction.

**THIS IS THE FIRST APPLICATION FOR EXTRAORDINARY RELIEF IN THIS CASE**

**NOTICE OF HEARING**

**THIS MOTION IS EXPECTED TO BE HEARD ON THE 22<sup>nd</sup> DAY OF JANUARY, 2019, AT 9:00 A.M., IN THE CHANCERY COURT FOR ROBERTSON COUNTY, TENNESSEE.**

Respectfully submitted,

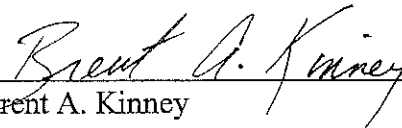


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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing document has been served with the Summons and Verified Complaint, Petition for Writ of Certiorari and Injunctive Relief.



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Brent A. Kinney