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**IN THE CIRCUIT COURT OF LAFAYETTE COUNTY, ARKANSAS  
CIVIL DIVISION**

FRIENDS OF LAKE ERLING ASSOCIATION

PLAINTIFF

v.

Case No. CV-2016-16-1

THE AGREED FOUNDATION D/B/A  
AMERICAN GAMEBIRD RESEARCH EDUCATION AND  
DEVELOPMENT FOUNDATION, INC.

DEFENDANT

**MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to ARCP Rule 65, Plaintiff seeks a preliminary injunction restoring the rights of its members and the public at large to the unrestricted right of access to and use of Lake Erling.

1. Plaintiff's members include property owners and residents of Lake Erling. They have enjoyed unrestricted use of Lake Erling pursuant to the Act of Exchange and the policies of Defendant's predecessor in interest, International Paper Company, since Lake Erling was created.

2. Recently, Defendant has attempted to restrict the public's right to use Lake Erling.

3. Plaintiff seeks a preliminary injunction enjoining Defendant from attempting to restrict the public's access to or use of Lake Erling in any manner.

4. Pursuant to the exhibits attached to Plaintiff's complaint and the undisputed facts contained therein, Plaintiff has established a likelihood of success on the merits.

5. Defendant's attempt to restrict the right of Plaintiff's members and the general public to unrestricted access to Lake Erling constitutes irreparable harm to Plaintiff's members.

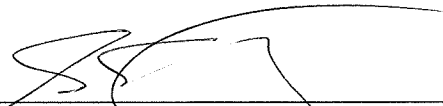
6. A brief accompanies this motion.

**FILED**  
2:20 PM  
MAR 08 2016  
Perry, D.C.  
VALARIE CLARK  
CIRCUIT CLERK  
LAFAYETTE COUNTY, AR

WHEREFORE, Plaintiff prays that the Court set this matter for hearing at its earliest convenience, grant Plaintiff's motion for a preliminary injunction, and enjoin the Defendant from restricting Plaintiff's members or the public at large from accessing and using Lake Erling, and for all further relief to which it is entitled.

Respectfully submitted,

BY:



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