

**IN THE CIRCUIT COURT OF MARIES COUNTY  
TWENTY-FIFTH JUDICIAL CIRCUIT  
STATE OF MISSOURI**

RON AND ANNE CALZONE,  
33867 Highway E  
Dixon, MO 65459

Plaintiffs,

v.

MARIES COUNTY COMMISSION; VIC STRATMAN,  
in his official capacity as Maries County  
Commissioner; ED FAGRE, in his official  
capacity as Maries County Commissioner; and  
DOUG DREWEL, in his official capacity as  
Maries County Commissioner;

Serve: Vic Stratman, Presiding Commissioner  
Maries County Commission  
211 Fourth Street  
Vienna, MO 65582

Defendants.

Case No. \_\_\_\_\_

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**PLAINTIFFS'  
MOTION FOR TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

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COME NOW, the Plaintiffs, Ron Calzone and Anne Calzone, pursuant to Missouri Rules of Civil Procedure 92(a) and moves this Court for entry of a temporary restraining order that prohibits Defendants and their agents from:

- 1) Continuing to hold closed meetings of the Maries County Commission in violation of the open meeting statutes in section 610.015 RSMo.
- 2) Continuing to hold meetings of the Maries County Commission without first posting

notice of the meetings and at least a tentative agenda, as required by section 610.020 RSMo.

3) Enforcement or otherwise pursuing any action resulting from meetings of the Maries County Commission held after April 6, 2020 in violation of the provisions of chapter 610.

Likewise, Plaintiff, pursuant to Missouri Rules of Civil Procedure 92(c) and moves this Court for entry of a preliminary injunction that prohibits Defendants and their agents from:

1) Continuing to hold closed meetings of the Maries County Commission in violation of the open meeting statutes in section 610.015 RSMo.

2) Continuing to hold meetings of the Maries County Commission without first posting notice of the meetings and at least a tentative agenda, as required by section 610.020 RSMo.

3) Enforcement or otherwise pursuing any action resulting from meetings of the Maries County Commission held after April 6, 2020 in violation of the provisions of chapter 610.

The Maries County Commission normally holds meetings every Monday and Thursday, so a timely response from this court is imperative.

Entry of such relief is appropriate in this case because Plaintiff is likely to succeed on the merits, there is ongoing irreparable harm to Plaintiffs, the ongoing harm to Plaintiffs absent an injunction outweighs any harm an injunction would cause to Defendants, and the issuance of an injunction is in the public interest.

The factual basis supporting this relief is contained in the Plaintiffs Petition and Plaintiffs' Suggestions in Support of this motion filed herewith. Bond should be waived or set at a nominal amount since there will be no demonstrable harm to Defendants if the requested relief is issued.

WHEREFORE, Plaintiff requests this Court:

A. Enter a temporary restraining order consistent with the forgoing motions.

B. Enter a preliminary injunction that consistent with the forgoing motions.

Respectfully submitted,

      /s/ Ron Calzone        
Ronald J. Calzone, pro se.  
33867 Highway E  
Dixon, MO 65459

      /s/ Ron Calzone        
Anne R. Calzone, pro se.  
33867 Highway E  
Dixon, MO 65459

I, Ronald J. Calzone, and Anne R. Calzone do hereby certify that a true and correct copy of the foregoing motion was provided to the Maries County Sheriff on, April 20, 2020, to be served on the following defendants.

Vic Stratman, Presiding Commissioner  
Maries County Commission  
211 Fourth Street  
Vienna, MO 65582  
FOR DEFENDANTS

By     /s/ Ron Calzone      
Ronald J. Calzone, pro se  
33867 Highway E  
Dixon, MO 65459  
PLAINTIFF

By     /s/ Anne Calzone      
Anne R. Calzone, pro se  
33867 Highway E  
Dixon, MO 65459  
PLAINTIFF

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