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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CHARLES CARREON
Plaintiff,
vs.
MATTHEW INMAN, INDIEGOGO, INC.,
NATIONAL WILDLIFE FEDERATION,
AND AMERICAN CANCER SOCIETY,
and Does 1 – 100,
Defendants,
and
KAMALA HARRIS, Attorney General of the
State of California,
A Person To Be Joined If
Feasible Under F.R.Civ.P. 19.

) Case No.: CV-12-3112-EMC
)
) **[PROPOSED] EX PARTE TEMPORARY**
) **RESTRAINING ORDER AND ORDER**
) **TO SHOW CAUSE RE PRELIMINARY**
) **INJUNCTION**

ORDER

TO DEFENDANTS INDIEGOGO, INC. AND MATTHEW INMAN:
YOU ARE EACH ORDERED TO SHOW CAUSE at ____m., on July __, 2012,
or as soon thereafter as counsel may be heard, in Courtroom ____, at the United
States Courthouse, 450 Golden Gate Avenue, San Francisco, California
_____, why (1) Indiegogo, Inc. (“Indiegogo”) should not be
restrained and enjoined pending trial from transferring the \$220,014 now in the
possession of Indiegogo, Inc. (the “Charitable Fund”) to Matthew Inman (“Inman”), or to
any other person or entity, (2) a constructive charitable trust should not be imposed upon

1 the Charitable Fund, and (3) the Charitable Fund should not be deposited in a blocked
2 account pending distribution of the Charitable Fund to the designated beneficiaries of the
3 Bear Love campaign, to wit, the defendants, the American Cancer Society, and the
4 National Wildlife Federation.

5 PENDING HEARING on the above Order to Show Cause, Indiegogo is HEREBY
6 RESTRAINED AND ENJOINED from disbursing the Charitable Fund, or any portion
7 thereof to Inman.

8 IT IS FURTHER ORDERED that this Order shall be served on Indiegogo no later
9 than ____ days before the day set for hearing, with proof of service to be filed no later
10 than ____ days before the date set for the hearing.

11
12 IT IS SO ORDERED.

13 Dated: July __, 2012

14
15 _____
16 Hon. Edward M. Chen
17 UNITED STATES DISTRICT COURT JUDGE

18 Respectfully submitted this 28th day of June, 2012, by:

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26 Attorney for Plaintiff Pro Se
27
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