

**IN THE CHANCERY COURT OF SUMNER COUNTY, TENNESSEE
AT GALLATIN**

PASCAL JOUVENCE,)	
)	
Plaintiff,)	
)	
vs.)	
)	Case No.: 25-CV-263
PAIGE BROWN, in her official capacity)	
as mayor of the City of Gallatin, and)	
THE CITY OF GALLATIN,)	
)	
Defendants.)	

PLAINTIFF PASCAL JOUVENCE’S MOTION FOR TEMPORARY INJUNCTION

COMES NOW Plaintiff Pascal Jouvence, by and through counsel, and pursuant to Rule 65 of the Tennessee Rules of Civil Procedure and respectfully moves this Court for temporary injunctive relief. Plaintiff seeks a temporary injunction enjoining Defendant Paige Brown from interfering with Plaintiff’s duties as an elected councilman of the City of Gallatin (“Gallatin”) by preventing him from using visual aids during deliberations of the council and refusing to place items on the agenda for committee meetings.

As set forth in the Verified Complaint and the Memorandum of Law, Defendant has repeatedly prevented Plaintiff from using visual aids during council meetings as she does not like the fact that Plaintiff is opposing her agenda of irresponsible growth in Gallatin and the fact that these visual aids expose the deleterious effect of such a reckless agenda on the citizens of Gallatin. Further, despite the unambiguous Gallatin Municipal Code which allows Councilman Jouvence to place items on the agenda, *see* Gallatin Municipal Code §2-71(c), Defendant Brown has refused to place items on the agenda upon Plaintiff’s timely requests. Thus, Defendant Brown has

unlawfully attempted to obstruct Plaintiff in violation of the City Charter, the doctrine of separation of powers and the Gallatin Municipal Code and a temporary injunction is needed to prevent irreparable harm to Plaintiff and his constituents. In support of such motion and filed contemporaneously herewith is a Memorandum of Law.

WHEREFORE, having good cause shown, Plaintiff respectfully submits that the Court should enter a temporary injunction 1) enjoining Defendant Brown from prohibiting Plaintiff from using visual aids during a council meeting or demanding a vote from the Council prior to doing so and 2) enjoining Defendant Brown from refusing to place items on the committee meeting agenda pursuant to Gallatin Municipal Code § 2-71(c) at Plaintiff's request.

Respectfully submitted,

CLEMENTS LAW FIRM, PLC

/s/Kirk L. Clements
KIRK L. CLEMENTS, BPR NO. 20672
Attorney for Plaintiffs
105 Broadway, St. 2
Nashville, TN 37201
615-964-8000
615-953-1902 (fax)
kirk@kirkclementsllaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing pleading has been forwarded to the attorneys via email pursuant to Rule 5.02(2) on this 14th day of January, 2026.

Robert M. Burns
Howell & Fisher, PLLC
3310 West End Avenue, Suite 550
Nashville, Tennessee 37203
rburns@howell-fisher.com

/s/ Kirk L. Clements
KIRK L. CLEMENTS