

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JAMES W. McCORD, JR.
7 Winder Court
Rockville, Maryland,
Plaintiff

v.

HON. GERALD FORD
The White House
Washington, D.C.

and

HON. PHILIP BUCHEN
The White House
Washington, D. C.

and

HON. WILLIAM SIMON
Department of the Treasury
Washington, D. C.

and

HON. ARTHUR SAMPSON
General Services Administration
Washington, D. C.,

Defendants

CIVIL ACTION

NO. _____

APPLICATION
FOR TEMPORARY RESTRAINING ORDER
AND/OR PRELIMINARY INJUNCTION

Comes now the applicant, JAMES W. McCORD, JR., plaintiff in the above-styled case, by and through his counsel, and moves the Court for a temporary restraining order and a preliminary injunction against the defendants, for the purpose of immediately restraining and enjoining them and each of them, their agents, employees, servants, or attorneys, from taking any steps to remove certain tape recordings from this jurisdiction and to enjoin them from relinquishing their custody and control over such tape recordings. The tape recordings referred to are the subject of an agreement entered into between the United States Government and Mr. Richard M. Nixon on or about September 6, 1974.

2.

A copy of the said agreement and the complaint herein are attached hereto.

FENSTERWALD & OHLHAUSEN
910 16th St., N.W.
Washington, D.C. 20006
Tel: 223-1667

BY: *R Fensterwald*

Attorney for Plaintiff-Applicant

Dated: September 20, 1974