

3. Because the agency action impacts whether Bookwalter will appear on the ballot less than two months from now and Bookwalter has invested considerable time, effort and resources into his campaign, time is of the essence and he will be irreparably harmed with no recourse if his name is not placed back on the ballot.

4. Bookwalter agrees he will pay all Court costs and abide by the agency determination if it is not set aside.

WHEREFORE, Petitioner, Thomas Charles Bookwalter, prays the Court grant a stay of the agency determination, restore his name to the ballot, set bond as required by the statute and enter all relief just and proper in the premises.

Verification

I, Petitioner, Thomas Charles Bookwalter, affirm under the penalties of perjury that the foregoing factual representations are true and accurate to the best of my knowledge and belief.


Thomas Charles Bookwalter

Respectfully submitted,

/s/ Michelle C. Harter

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Pro Hac Vice Admission pending

Attorneys for Bookwalter

CERTIFICATE OF SERVICE

I certify that on the 14th day of March, 2022, I electronically filed the foregoing *Verified Petition for Emergency Stay Pending Judicial Review and Request for the Court to Set Bond* using the Indiana E-Filing System.

I also certify that on the 14th day of March, 2022, the foregoing document was served upon the following via certified mail:

Indiana Election Commission,
c/o Paul Okeson, Chairman,
302 W. Washington St., Rm E204,
Indianapolis, IN 46204

Gregory L. Irby
117 Parkville Dr.
Danville, Indiana 46122

Cody Eckert
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Greencastle, Indiana 46135

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/s/ Michelle C. Harter
Michelle C. Harter