

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

In Re. Gender Queer, A Memoir

Case No: CL22-1985

**MOTION FOR TEMPORARY RESTRAINING ORDER**

Comes now, the Petitioner, Tommy Altman, by counsel, and moves this Court for the issuance of a Temporary Restraining Order against the parties listed on the certificate of service from publishing, selling, renting, lending or exhibiting the book the book Gender Queer, A Memoir to minors.

Book Title: Gender Queer, A Memoir / ISBN 978-1-5493-0400-2

Author: Maia Kobabe: Address:

Publisher: Lion Forge LLC - 227 N. Lindenbergh Blvd, St. Louis, MO 63141

And in support thereof states as follows:

1. That on May 18, 2022, this Court entered an Order to Show Cause pursuant 18.2-384 of the Code of Virginia finding probable cause that the aforementioned book is obscene for unrestricted viewing by minors.
2. Pursuant to 18.2-384(5) and 18.2-384(11) of the Code of Virginia this Court may, upon four days' notice to be given to the persons and in the manner prescribed by the court may issue a temporary restraining order against the sale or distribution of the book alleged to be obscene.

Wherefore, the Petitioner moves this Court for a Temporary Restraining Order prohibiting the sale or distribution to minors by any person who publishes, sells, rents, lends, transports in intrastate commerce, or commercially distributes or exhibits the book, or has the book in his

possession with intent to publish, sell, rent, lend, transport in intrastate commerce, or commercially distribute or exhibit the book Gender Queer, A Memoir

Respectfully Submitted,

Tommy Altman

By:  \_\_\_\_\_

Counsel

Timothy Anderson  
Anderson & Associates PC  
2492 N. Landing Rd 104  
Virginia Beach VA 23456  
757-301-3636 Tel  
757-301-3640 Fax

**CERTIFICATE OF SERVICE**


I HEREBY CERTIFY, that a true copy of this notice was emailed to the following:

Regina.Toneatto@VBSchools.com  
Clerk of the Virginia Beach School Board  
2512 George Mason Drive  
Virginia Beach VA 23456

And sent via Fedex Overnight Delivery to:

Brad Feuer Vice President,  
General Counsel and Corporate Secretary  
Barnes & Noble, Inc.  
122 Fifth Avenue New York, NY 10011

This 18 day of May 2022.

  
\_\_\_\_\_  
Timothy Anderson

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

In Re. Gender Queer, A Memoir

Case No: CL22-1985

TEMPORARY RESTRAINING ORDER

CAME THIS DAY, the Petitioner, Tommy Altman, by counsel, and moved this Court for the issuance of a Temporary restraining order prohibiting the publishing, selling, renting, lending or exhibiting the book the book Gender Queer, A Memoir to minors.

Book Title: Gender Queer, A Memoir / ISBN 978-1-5493-0400-2

Author: Maia Kobabe:

Publisher: Lion Forge LLC - 227 N. Lindenbergh Blvd, St. Louis, MO 63141

The Court finds as a matter of law the following:

1. That on May 18, 2022, this Court entered an Order to Show Cause pursuant 18.2-384 of the Code of Virginia finding probable cause that the aforementioned book is obscene for unrestricted viewing by minors.
2. That (4) four days' notice of the Motion for Temporary Restraining Order to the parties has been made as indicated on the certificate of service:

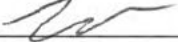
It therefore is hereby

ORDERED that pursuant to 18.2-384(5) and 18.2-384(11) of the Code of Virginia that Barnes and Noble and Virginia Beach Public Schools are hereby restrained from publishing, selling, renting, lending or exhibiting the book the book Gender Queer, A Memoir to minors.

Entered:

\_\_\_\_\_  
Circuit Court Judge

I Ask for this:

  
\_\_\_\_\_  
Timothy Anderson  
Counsel for the Petitioner  
2492 N. Landing Rd 104  
Virginia Beach VA 23456  
757-301-3636 Tel  
757-301-3640 Fax

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF VIRGINIA BEACH

In Re. Gender Queer, A Memoir

Case No: CL22-1985

**ORDER TO SHOW CAUSE PURSUANT TO  
18.2-384 OF THE CODE OF VIRGINIA**

CAME THIS DAY, the Petitioner and moved this Court for an entry of Show Cause pursuant to 18.2-384 of the Code of Virginia to declare the book Gender Queer, A Memoir, ISBN: 978-1-5493-0400-2 obscene for unrestricted viewing by minors, and the Court having reviewed the Petition, and the subject book in question finds that there is probable cause to believe that the book Gender Queer, A Memoir is obscene for unrestricted viewing by minors and does hereby

**ORDER** that counsel for the Petitioner shall send by registered mail a copy of the petition and this order to:

Author: Maia Kobabe: Address:

Publisher: Lion Forge LLC - 227 N. Lindbergh Blvd, St. Louis, MO 63141

And that further it is

**ORDERED** that Maia Kobabe and Lion Forge LLC, shall respond to the allegations of this petition within 21 days after service of this order by registered mail or by publication, whichever is later and it is further

**ORDERED** that a copy of this Order be circulated in the Virginia Pilot, a newspaper of general circulation once per week for two successive weeks starting May 26, 2022

Entered

*5/18/22*  
*James S. Baskerville*

Circuit Court Judge

I ask for this:

*Timothy Anderson*  
\_\_\_\_\_  
Timothy Anderson  
Counsel for the Petitioner  
2492 N. Landing Rd 104  
Virginia Beach VA 23456  
757-301-3636 Tel  
757-301-3640 Fax