

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Corey Jones v. Jennifer Friddell, et al.

Jones · No. 3:25-cv-2693 · Decided January 2, 2026

SUMMARY

The United States District Court for the Northern District of Ohio denied Corey Jones’s motion for an ex parte temporary restraining order seeking to prevent enforcement of a municipal-court bench warrant. The court held that Jones failed to satisfy the notice and irreparable-harm requirements of Federal Rule of Civil Procedure 65(b).

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Western Division
WRITING FOR THE COURT	Jeffrey J. Helmick
JURISDICTION	United States District Court for the Northern District of Ohio, Western Division
DECIDED	January 2, 2026
DOCKET	3:25-cv-2693
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff moved for an ex parte temporary restraining order under Federal Rule of Civil Procedure 65(b) to enjoin the Toledo Municipal Court from enforcing a bench warrant issued after his failure to appear at a probation-violation hearing.
STANDARD OF REVIEW	A movant seeking a temporary restraining order or preliminary injunction must establish the applicable equitable factors, including likelihood of success on the merits, irreparable harm, harm to others, and the public interest. For an ex parte TRO, Federal Rule of Civil Procedure 65(b)(1) additionally requires specific facts showing immediate and irreparable injury before the opposing party can be heard and written certification of notice efforts and reasons notice should not be required.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order

TOPICS

injunctions

civil procedure

PRACTICE AREAS

civil procedure

constitutional law

injunctive relief

QUESTIONS PRESENTED

1. Whether Jones satisfied the requirements for an ex parte temporary restraining order under Federal Rule of Civil Procedure 65(b)(1).
2. Whether Jones demonstrated irreparable injury that could not be remedied by monetary damages.
3. Whether the equitable factors supported issuance of a temporary restraining order.

HOLDINGS

1. Jones was not entitled to an ex parte temporary restraining order because he failed to show by specific facts that immediate and irreparable injury would occur before Defendants could be heard, and he failed to establish the required justification for proceeding without notice.
2. Jones failed to show irreparable injury because he did not establish that the alleged violation of his constitutional rights could not be remedied by monetary damages.
3. The motion failed under the four-factor test governing temporary restraining orders and preliminary injunctions because Jones did not establish the required likelihood of success and irreparable harm, and the court therefore denied the requested extraordinary relief.

KEY QUOTATIONS

“Thus, Jones has not met his “substantial burden” to demonstrate he is entitled to the extraordinary relief he seeks.” (Discussion section)

“For the reasons stated above, I deny Plaintiff Corey Jones’ motion for an ex parte temporary restraining order.” (Conclusion)

FACTUAL BACKGROUND

Jones was serving a five-year term of probation after convictions in Toledo Municipal Court, including for telecommunications harassment. After he failed to appear for a probation-violation hearing, the municipal court issued a bench warrant. Jones sought to enjoin enforcement of that warrant, asserting that arrest would cause immediate and irreparable harm and that notice of his federal motion would likely trigger his arrest.

PROCEDURAL HISTORY

Corey Jones filed an emergency motion for an ex parte temporary restraining order in federal district court. The motion sought to prevent enforcement of a Toledo Municipal Court bench warrant. The district court denied the motion because Jones failed to satisfy the notice and irreparable-injury requirements for ex parte relief and failed to show that the alleged constitutional injury could not be remedied by monetary damages.

DISPOSITION

other

CASES CITED

- Jane Doe v. Barron, 92 F. Supp. 2d 694, 695 (S.D. Ohio 1999)
- Overstreet v. Lexington-Fayette Urban County Government, 305 F.3d 566, 573 (6th Cir. 2002)
- McPherson v. Michigan High School Athletic Association, 119 F.3d 453, 459 (6th Cir. 1997) (en banc)
- Essak v. Sosnowski, No. 25-11470, 2025 WL 2533984, at *2 (E.D. Mich. Sept. 3, 2025)
- Leary v. Daeschner, 228 F.3d 729, 739 (6th Cir. 2000)
- Winter v. Natural Resources Defense Council, 555 U.S. 7 (2008)
- EOG Resources, Inc. v. Lucky Land Management, LLC, 134 F.4th 868, 884 (6th Cir. 2025)
- City of Toledo v. Jones, Case No. CRB-23-00606

OPINION

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION Corey Jones, Case No. 3:25-cv-2693 Plaintiff, v. MEMORANDUM
OPINION AND ORDER Jennifer Friddell, et al., Defendants. I. INTRODUCTION AND
BACKGROUND Plaintiff Corey Jones, proceeding pro se, filed an “emergency motion” for an ex
parte temporary restraining order. (Doc. No. 4). Jones seeks an order enjoining the Toledo, Ohio
Municipal Court from enforcing a bench warrant issued after Jones failed to appear for a probation
violation hearing.

(Id.); see also City of Toledo v. Jones, Case No. CRB-23-00606. Jones is serving a five- year term
of probation because he previously was found guilty before the Toledo Municipal Court on several
charges, including telecommunications harassment.

For the reason stated below, I deny Jones’ motion. II. DISCUSSION The movant bears the burden
of demonstrating that a temporary restraining order is warranted under Fed. R. Civ. P. 65(b). See
Jane Doe v. Barron, 92 F. Supp. 2d 694, 695 (S.D. Ohio 1999).

In determining whether to issue a TRO or a preliminary injunction, I must examine and weigh the
following four factors: (1) whether the moving party has shown a strong likelihood of success on
the merits; (2) whether the moving party will suffer irreparable harm if the injunction is not issued;
(3) whether the issuance of the injunction would cause substantial harm to others; and (4) whether
the public interest would be served by issuing the injunction.

Overstreet v. Lexington– Fayette Urban Cnty. Gov’t, 305 F.3d 566, 573 (6th Cir. 2002);
McPherson v. Mich. High Sch. Athletic Ass’n, 119 F.3d 453, 459 (6th Cir. 1997) (en banc). When
a party seeks issuance of a temporary restraining order without prior notice to the opposing party,

the movant show: (A) specific facts in an affidavit or a verified complaint clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition; and (B) the [movant must certify]... in writing any efforts made to give notice and the reasons why it should not be required.

Fed. R. Civ. P. 65(b)(1). Jones fails to make either showing. He claims he will suffer immediate and irreparable harm if he is arrested on the outstanding bench warrant and that providing Defendants with notice “would likely trigger” his arrest. But two days after the bench warrant was issued on November 19, 2025, Jones himself provided the Toledo Municipal Court with his address.

(See Doc. No. 1-3 at 1). He fails to explain how providing Defendants notice of his motion would make it any more likely that he will be arrested than his own prior conduct. Moreover, this is the third time a Toledo Municipal Court judge has been forced to enter a bench warrant due to Jones’ failure to appear for court hearings. See *City of Toledo v. Jones*, Case No. CRB-23-00606.

In both previous instances, Jones has had the opportunity to respond to the warrants and maintain his release on bond. *Id.* Thus, Jones has not met his “substantial burden” to demonstrate he is entitled to the extraordinary relief he seeks. *Essak v. Sosnowski*, No. 25-11470, 2025 WL 2533984, at *2 (E.D. Mich. Sept. 3, 2025) (citing *Leary v. Daeschner*, 228 F.3d 729, 739 (6th Cir.

2000)) (abrogated on other grounds by *Winter v. Nat’l Resources Defense Council*, 555 U.S. 7 (2008)). Even if I assume Jones could meet that burden, his motion still fails. A court may not enter a temporary restraining order unless the party seeking the order can show he would suffer an irreparable injury without it. See, e.g., *EOG Resources, Inc. v. Lucky Land Mgmt., LLC*, 134 F.4th 868, 884 (6th Cir.

2025). “‘Irreparable’ means ‘not fully compensable by monetary damages.’” *Id.* (quoting *Overstreet*, 305 F.3d at 578). Jones has not shown the alleged violation of his constitutional rights could not be remedied by monetary damages. III. CONCLUSION For the reasons stated above, I deny Plaintiff Corey Jones’ motion for an ex parte temporary restraining order. (Doc.

No. 4). So Ordered. s/ Jeffrey J. Helmick United States District Judge