

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

William J. Amato v. City of Toledo, et al.

Amato · No. 3:26-cv-813 · Decided April 28, 2026

SUMMARY

The United States District Court for the Northern District of Ohio denied William J. Amato’s motion for a temporary restraining order and preliminary injunction. The court held that the alleged seizure of Amato’s cell phone and issuance of a courthouse trespass order occurred after the complaint was filed, involved individuals not named as defendants, and were not sufficiently related to the conduct alleged in the complaint. The court concluded that Amato therefore failed to establish entitlement to injunctive relief.

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	April 28, 2026
DOCKET	3:26-cv-813
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for a temporary restraining order and preliminary injunction in an action alleging constitutional violations arising from indirect contempt proceedings in Toledo Municipal Court.
STANDARD OF REVIEW	The court applied the preliminary-injunction and temporary-restraining-order standard, considering likelihood of success on the merits, irreparable injury, harm to others, and the public interest.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion and order

TOPICS

- injunctions
- civil procedure
- first amendment
- free speech

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Amato was entitled to a temporary restraining order or preliminary injunction based on the alleged post-complaint seizure of his cell phone and issuance of a courthouse trespass notice.
2. Whether the requested injunctive relief was sufficiently related to the conduct alleged in the original complaint.

HOLDINGS

1. A plaintiff seeking a temporary restraining order or preliminary injunction must establish a relationship between the injury identified in the motion and the conduct asserted in the complaint; Amato failed to do so because the phone seizure and trespass order occurred after the complaint was filed, were not alleged in the complaint, and involved individuals not named as defendants.
2. Amato was not entitled to a temporary restraining order or preliminary injunction because he failed to meet his burden to establish entitlement to injunctive relief.

KEY QUOTATIONS

“To grant either form of injunctive relief, a court must consider: “(1) whether the movant has a strong likelihood of success on the merits; (2) whether the movant would suffer irreparable injury absent a stay; (3) whether granting the stay would cause substantial harm to others; and (4) whether the public interest would be served by granting the stay.”” (Opinion section II)

“Amato is not entitled to a temporary restraining order or preliminary injunction because he “fails to establish a relationship between the injury claimed in . . . [his] motion and the conduct asserted in the complaint.”” (Opinion section II)

FACTUAL BACKGROUND

Amato filed suit against the City of Toledo and other defendants based on constitutional claims arising from indirect contempt proceedings allegedly initiated after he recorded inside the Toledo Municipal Court in violation of a court rule. After the complaint was filed, court security personnel allegedly confiscated his cell phone while he was recording publicly posted signage and issued him a notice barring courthouse access except for mandatory appearances. His emergency motion sought return of the phone and an injunction against enforcement of the trespass order.

PROCEDURAL HISTORY

Amato filed this federal action concerning contempt proceedings allegedly initiated after he recorded inside the Toledo Municipal Court. After filing the complaint, court security personnel allegedly confiscated his cell phone and issued him a courthouse trespass notice. He then moved for emergency injunctive relief seeking return of the phone and an injunction against enforcement of the trespass order. The district court denied the motion.

DISPOSITION

other

CASES CITED

- University of Texas v. Camenisch, 451 U.S. 390, 395 (1981)
- Procter & Gamble Co. v. Bankers Trust Co., 78 F.3d 219, 226 (6th Cir. 1996)
- Northeast Ohio Coalition for Homeless & Service Employees International Union, Local 1199 v. Blackwell, 467 F.3d 999, 1009 (6th Cir. 2006)
- In re De Lorean Motor Co., 755 F.2d 1223, 1229 (6th Cir. 1985)
- Jones v. Caruso, 569 F.3d 258, 265 (6th Cir. 2009)
- Colvin v. Caruso, 605 F.3d 282, 300 (6th Cir. 2010)
- Devose v. Herrington, 42 F.3d 470, 471 (8th Cir. 1994)
- Omega World Travel, Inc. v. Trans World Airlines, 111 F.3d 14, 16 (4th Cir. 1997)
- Pacific Radiation Oncology, LLC v. Queen's Medical Center, 810 F.3d 631, 636 (9th Cir. 2015)
- De Beers Consolidated Mines v. United States, 325 U.S. 212, 220 (1945)
- Hendricks v. Hazzard, No. 2:11-CV-399, 2013 WL 2635729, at *4 (S.D. Ohio June 12, 2013)
- Hendricks v. Hazzard, No. 2:11-CV-399, 2013 WL 5944082 (S.D. Ohio Nov. 5, 2013)

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