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*Leonard C. Horn*

SUPERIOR COURT OF NEW JERSEY  
CHANCERY DIVISION, ATLANTIC COUNTY  
DOCKET NO.

THE MISS AMERICA PAGEANT, a Cor-  
poration of the State of New  
Jersey,

Plaintiff,

vs.

WOMEN'S LIBERATION MOVEMENT,  
JOHN DOE, MAXINE ORRIS, NATIONAL  
ORGANIZATION FOR WOMEN, MEDIA WORKSHOP;  
NEW WOMAN, THE FEMINISTS, HIGH SCHOOL  
WOMEN'S COLLECTIVE and unknown persons:  
associated with these defendants,

Defendants.

Civil Action

COMPLAINT

The Plaintiff, The Miss America Pageant, a Corporation of the State of New Jersey, with its principal office at Tennessee Avenue, Atlantic City, New Jersey, complaining of the defendants, says that:

1. The Miss America Pageant is a non profit corporation organized for the purpose of conducting a beauty and talent contest for the purpose of awarding scholarships to young ladies desiring to further their education.

2. The Plaintiff conducts the National Contest during the course of a four day period in Atlantic City, New Jersey in the Atlantic City Convention Hall. The said activities are taking place this year between September 3, 1969 and September 6, 1969.

3. The Defendants are a group of women who desire to interrupt and interfere with the peaceable quiet and good order of the Plaintiff's activities as above described and have in the past come to Atlantic City and engaged in picketing in such a manner as to create chaos and violence in front of and in the Atlantic City Convention Hall; they have in the past used offensive and loud language, have interfered with

ingress and egress into and from the Convention Hall, have burned clothing such as certain articles of women's underwear and have exploded bombs which emitted noxious odors and have conducted themselves as disorderly persons and have endangered the public health, safety, morals and general welfare of the community with the objective of destroying, damaging and ridiculing the Plaintiff, Miss America and the Plaintiff's activities.

4. In the past as described hereinabove and more particularly in September 1968, the above activities of the Defendants were conducted and did cause irreparable damage to the Plaintiff. Unless the Defendants are enjoined from demonstrating against the Plaintiff in any manner other than peacefully and lawfully, the Plaintiff will sustain immediate and irreparable damage which cannot be entirely avoided by the present statutes and laws of the State of New Jersey and its designated police power.

5. In accordance with the above, there is no adequate remedy at law and equitable relief is mandatory.

WHEREFORE, Plaintiff demands;

(a) A restraining order be issued immediately restraining the Defendants from performing any acts with the intention of committing a breach of the peace or disrupting or interfering with the peaceable assembly and passage of persons in front of or in the Atlantic City Convention Hall;

(b) Such other relief as the Court deems appropriate;

