

UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND

LEADERS OF A BEAUTIFUL STRUGGLE
et al.,

Plaintiffs,

v.

BALTIMORE POLICE DEPARTMENT
et al.,

Defendants.

Civil Action No. 20-929

**TELEPHONIC ORAL
ARGUMENT REQUESTED**

**PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER & A
PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that as soon as counsel may be heard, Plaintiffs, through undersigned counsel, will move the Court for entry of a Temporary Restraining Order and a Preliminary Injunction in the form attached and asking that this matter be set down for a hearing to convert those temporary restraints into a Preliminary Injunction pursuant to Fed. R. Civ. P. 65 and Local Rule 65.1. In support of their motion, Plaintiffs submit the accompanying Memorandum of Law in Support of Their Motion for a Temporary Restraining Order; the declarations of Plaintiffs Leaders of a Beautiful Struggle (through Dayvon Love), Erricka Bridgeford, and Kevin James; and the declaration of attorney Alexia Ramirez with attached exhibits.*

WHEREFORE, Plaintiffs respectfully request that this Court:

1. Grant this Motion for a Temporary Restraining Order and/or Preliminary

* Plaintiffs respectfully request that, given the restrictions in place surrounding the present public-health crisis around the country and the geographic locations of Plaintiffs' counsel, any oral argument ordered by the Court take place telephonically.

Injunction;

2. Enter the Proposed Order Granting Plaintiffs' Motion for a Temporary

Restraining Order and/or Preliminary Injunction; and

3. Grant such other and further relief as justice may require.

April 9, 2020

Respectfully submitted,

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* *pro hac vice* application forthcoming

Counsel for Plaintiffs