

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

YI FANG CHEN, individually and on behalf  
of her minor children M.P., Ma.P., and P.P.,

Plaintiff,

v.

ZOHRAN MAMDANI, in his official  
capacity as Mayor of the City of New York;  
KAMAR H. SAMUELS, in his official  
capacity as Chancellor of the New York City  
Department of Education; and the NEW  
YORK CITY DEPARTMENT OF  
EDUCATION,

Defendants.

Case No. 1:26-cv-03355

**PLAINTIFF'S NOTICE OF MOTION FOR PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that, pursuant to Rule 65 of the Federal Rules of Civil Procedure, and upon the accompanying Memorandum of Law in Support, the Declaration of Yi Fang Chen, the Declaration of Glenn E. Roper, the Complaint, and the exhibits attached thereto, and upon such other and further argument and submissions as may be presented to the Court, Plaintiff Yi Fang Chen hereby moves this Court for an order:

1. preliminarily requiring Defendants to admit M.P. to Stuyvesant High School for the 2026–2027 school year pending final resolution of this action; and
2. granting such other and further relief as the Court deems just and proper.

Pursuant to Local Civil Rule 6.1(b), any opposing or response papers must be served within 14 days after service of the moving papers on the Defendants.

Dated April 27, 2026.

Respectfully Submitted,

/s/ Dean McGee

Glenn E. Roper, Colo. Bar No. 38723\*  
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and on behalf of her minor children M.P., Ma.P., and P.P.*

\*pro hac vice motions pending