

**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

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\* 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,

Brett Max Kaufman\*  
Ashley Gorski\*  
Alexia Ramirez\*  
Nathan Freed Wessler\*  
Ben Wizner\*  
American Civil Liberties Union Foundation  
125 Broad Street, 18th Floor  
New York, NY 10004  
T: 212.549.2500  
F: 212.549.2654  
bkaufman@aclu.org  
agorski@aclu.org  
aramirez@aclu.org  
nwessler@aclu.org  
bwizner@aclu.org

/s/ David R. Rocah  
David R. Rocah (Bar No. 27315)  
American Civil Liberties Union Foundation of  
Maryland  
3600 Clipper Mill Road, Suite 350  
Baltimore, MD 21211  
T: 410.889.8555  
F: 410.366.7838  
rocah@aclu-md.org

\* *pro hac vice* application forthcoming

*Counsel for Plaintiffs*