

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

STATE OF NEW YORK, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, *in his official
capacity as President of the United
States*, et al.,

Defendants.

Case No. 20 Civ. 2340

**PLAINTIFFS' NOTICE OF MOTION
(Fed. R. Civ. P. 65)**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 65, Plaintiffs hereby move the Court for a preliminary injunction with respect to their claim for relief under the Postal Accountability and Enhancement Act, 39 U.S.C. § 3661. *See* Compl. ¶¶ 189-193. Plaintiffs request that the Court enjoin Defendants from implementing, applying, or taking any action pursuant to Defendants' Postal Policy Changes, in order to preserve the status quo pending further proceedings, or until this case is decided on the merits and final judgment is entered.

In support of this motion, Plaintiffs rely on the accompanying Memorandum of Law; the Declaration of Morenike Fajana dated September 2, 2020; the exhibits attached to that Declaration; the pleadings and papers on file in this action; and any argument and evidence that is presented on any hearing in this matter.

DATED: September 2, 2020

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Respectfully submitted,

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