

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
(Northern Division)**

BALTIMORE COUNTY BRANCH OF THE
NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE, *et al.*,

Plaintiffs,

v.

BALTIMORE COUNTY, MARYLAND, *et al.*,

Defendants.

Civil Action No. LKG-21-03232

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Baltimore County Branch of the National Association for the Advancement of Colored People, League of Women Voters of Baltimore County, Common Cause Maryland, Charles Sydnor, Anthony Fugett, Dana Vickers Shelley, Danita Tolson, Sharon Blake, Gerald Morrison, and Niesha McCoy respectfully move this Court for a preliminary injunction enjoining Defendants from conducting future elections for Baltimore County Council under the unlawful redistricting plan ("Bill 103-21") enacted December 20, 2021.

Plaintiffs' arguments in support of this motion are fully set forth in the attached Memorandum of Law.

Respectfully submitted,

/s/ Deborah A. Jeon

Deborah A. Jeon (Bar #06905)
Tierney Peprah (Bar #21986)
AMERICAN CIVIL LIBERTIES UNION
OF MARYLAND
3600 Clipper Mill Road Suite 350
Baltimore, MD 21211
(410) 889-8555

/s/ John A. Freedman

John A. Freedman (Bar #20276)
Mark D. Colley (Bar #16281)
ARNOLD & PORTER KAYE SCHOLER LLP
601 Massachusetts Ave, N.W.
Washington, D.C. 20001
(202) 942-5000

/s/ Andrew D. Freeman

Andrew D. Freeman (Bar #03867)
BROWN GOLDSTEIN & LEVY LLP
120 E. Baltimore Street, Suite 2500
Baltimore, MD 21202-6701
(410) 962-1030

Michael Mazzullo (pro hac vice pending)
ARNOLD & PORTER KAYE SCHOLER LLP
250 W. 55th Street
New York, NY 10019
(212) 836-8000

Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, John A. Freedman, certify that copies of the foregoing Motion for Preliminary Injunction were served this 19th day of January 2022 upon all counsel of record by ECF.

/s/ John A. Freedman

John A. Freedman