

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

NOHORA RIVERO, et al.,

Plaintiffs,

v.

MONTGOMERY COUNTY,
MARYLAND, et al.,

Defendants.

Case No.: _____

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Nohora Rivero and Legal Aid Bureau, Inc., a/k/a Maryland Legal Aid, by and through their undersigned attorneys, move this Court for:

(1) entry of an order preliminarily enjoining Defendants Montgomery County, Maryland, J. Thomas Manger, and Alexander Kettering from (a) enforcing the no-trespass order issued against Plaintiffs on August 18, 2015; (b) issuing instructions to Plaintiffs to leave property (the "Farm") owned by Defendants Linda Lewis and Robert Lewis; or (c) issuing similar instructions or no-trespass orders against similar parties in similar circumstances in the future; and

(2) entry of an order preliminarily enjoining Defendants Fruits and Vegetables by Lewis Orchards, LLC, d/b/a Lewis Orchards, Linda Lewis, and Robert Lewis (the "Lewis Defendants") from (a) interfering with the rights of Plaintiffs or similar parties to visit and speak privately with migrant

workers residing on the Farm, and (b) retaliating against any migrant worker employed by the Lewis Defendants for any reason related to this suit.

As support for this motion, Plaintiff relies on the following documents filed herewith: (1) Memorandum of Law in Support of Plaintiff's Motion for Preliminary Injunction; (2) Affidavit of Nohora Rivero; and (3) Affidavit of C. Shawn Boehringer.

April 20, 2016

Respectfully submitted,

/s/ Deborah A. Jeon

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PROOF OF SERVICE

I certify that on the 20th day of April, 2016, a true and correct copy of the foregoing: “Plaintiffs’ Motion for Preliminary Injunction” was served by operation of the electronic filing system of the U.S. District Court for the District of Maryland upon all counsel who have consented to receive notice of filings in the matter styled *Rivero, et al. v. Montgomery County, Maryland, et al.*, Case No. [CASE NUMBER], and by personal service in accordance with Federal Rule of Civil Procedure 5(b)(2) upon all other persons required to be served under Federal Rule of Civil Procedure 5.

/s/ Deborah A. Jeon
Deborah A. Jeon