

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

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TERESA RICHARDSON, CHRISTOPHER CARROLL,
GINA ARFI, and AIDA ZYGAS,

Plaintiffs,

-against-

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

LOUIS DEJOY, *in his official capacity as Postmaster
General of the United States,* and

UNITED STATES POSTAL SERVICE,

Defendants.
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Case No. 20-cv-02262 (EGS)

PLAINTIFFS’ APPLICATION FOR A PRELIMINARY INJUNCTION

Plaintiffs Teresa Richardson, Christopher Carroll, Gina Arfi, and Aida Zygias (collectively “Plaintiffs”), by and through their undersigned counsel, hereby move this Court, pursuant to Rule 65 of the Federal Rules of Civil Procedure and Local Rule 65.1, for a preliminary injunction.

For the reasons stated in Plaintiffs’ accompanying Memorandum of Points and Authorities and the declarations and exhibits attached thereto (filed concurrently herewith), Plaintiffs respectfully request that this Court enter an Order directing Defendants Donald J. Trump, Louis DeJoy, and the United States Postal Service (“USPS”) to: (1) return postal operations and restore postal service to that in place on January 1, 2020; (2) replace or restore the removed the high-speed sorting machines and mailboxes that have been taken out of service and put them back into operation; (3) restore overtime pay and lift the hiring freeze so that USPS can hire additional employees when and where necessary to ensure the timely processing and delivery of mail-in ballots; (4) make all late mail deliveries instead of letting mail be delayed or go undelivered; (5) restore seasoned employees to their former positions, including the employees who were reassigned or displaced

in the recent USPS reorganization; and (6) refrain from any and all other conduct that is intended to interfere and/or interferes with Plaintiffs' fundamental right to vote in United States elections, including but not limited to the 2020 presidential election. Plaintiffs further respectfully request that this Court appoint a special master to oversee compliance with the Order.

A proposed Order is filed concurrently herewith.

Dated: Washington, D.C.
August 20, 2020

Respectfully submitted,

BERG & ANDROPHY

/s/ David H. Berg

David H. Berg
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/s/ Joel M. Androphy

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