

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

NATIONAL ASSOCIATION FOR THE )  
ADVANCEMENT OF COLORED )  
PEOPLE, )

Plaintiff, )

v. )

Civil Action No. 20-cv-2295 (TSC)

UNITED STATES POSTAL SERVICE, )  
et al., )

Defendants. )

\_\_\_\_\_ )

**PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and Local Rule 65.1(c), plaintiff National Association for the Advancement of Colored People hereby moves for a preliminary injunction requiring defendants United States Postal Service and Louis DeJoy to rescind changes to postal service announced in the July 10, 2020, “PMG Expectations and Plan” and “Pivot.” Defendants’ counsel has been consulted and advises that Defendants do not consent to this relief.

In support of this motion, Plaintiff submits the accompanying (1) memorandum of law, (2) Declarations of Carmen Watkins and Earl Graham, and (3) a proposed order.

Dated: September 1, 2020

Respectfully submitted,

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/s/ Allison M. Zieve  
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