UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

VOTE FORWARD, et al.,

Plaintiffs,

v.

LOUIS DEJOY, in his official capacity as the Postmaster General; and the UNITED STATES POSTAL SERVICE, Civil Case No. 1:20-cv-02405

Defendants.

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs hereby move the Court for an order enjoining Defendants Louis DeJoy, Postmaster General of the United States, and the United States Postal Service, together with any officers, agents, and employees thereof, until further order of this Court from implementing the Late/Extra Trip Policy announced in the July 10, 2020 document entitled "Mandatory Stand-Up Talk: All Employees." *See* Ex. 2, USPS, *Mandatory Stand-Up Talk: All Employees* (July 10, 2020). Plaintiffs submit a memorandum in support of their motion and the exhibits attached thereto and a proposed order.

Pursuant to Local Civil Rule 7(m), Plaintiffs' counsel discussed this motion in good faith with Defendants' counsel to determine whether there is any opposition to the relief sought and to narrow any areas of disagreement. Defendants' counsel stated that Defendants oppose this motion.

Respectfully submitted,

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Date: September 8, 2020

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