

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PATRICK QUINN, IRENE ROBINSON,)
ANTWAIN MILLER, MARC KAPLAN,)
CHRISTOPHER BALL, DANIEL)
MORALES-DOYLE, and JITU BROWN,)

Plaintiffs,)

v.)

BOARD OF EDUCATION OF THE CITY)
OF CHICAGO, *et al.*,)

Defendants.)

No. 16-cv-9514

The Honorable Elaine E. Bucklo

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

NOW COME Plaintiffs, by and through their undersigned counsel and pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, and move the Court to enter a preliminary injunction requiring defendants to draft procedures for an election of members of the Board of Education while this suit is pending in order to allow for an election on April 4, 2017. In the alternative, plaintiffs ask this Court to advance the trial on the merits of certain of their claims pursuant to Fed. R. Civ. P. 65(a)(2) and enter judgment in Plaintiffs' favor. In support of their motion, Plaintiffs have filed a motion seeking leave to file a brief that is in excess of the Court's page limit.

WHEREFORE, Plaintiffs respectfully request that the Court order the defendants to draft procedures for an election on April 4, 2017 or in the alternative enter a permanent injunction ordering the defendants to hold said election.

Dated: November 30, 2016

Respectfully submitted,

s/ Sean Morales-Doyle

One of Plaintiffs' Attorneys

Thomas H. Geoghegan
Michael P. Persoon
Sean Morales-Doyle
Despres, Schwartz & Geoghegan, Ltd.
77 West Washington Street, Suite 711
Chicago, Illinois 60602
(312) 372-2511