IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

C.G., a minor, by and through her parents, and next friends, P.G. and D.G.,	:	
Plaintiff,	:	
v.	:	**No: 5:21-cv-03956-JFL**
Saucon Valley School District,	:	
	:	**Jury Trial Demand**
Defendant.	:	

PLAINTIFF'S
MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and 42 U.S.C. §12133 Plaintiff C.G., a minor, by and through her parents and next friends, P.G. and D.G., hereby moves for the Court for issuance of a preliminary injunction against Defendant Saucon Valley School District to prohibit Defendant from violating Title II of the Americans with Disabilities Act, 42 U.S.C. §§ 12101-12213, and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, by denying Plaintiff's request to allow her service animal to accompany her to school and from otherwise discriminating against C.G. on the basis of her disability and her association with her service animal.

Plaintiff requests oral argument for this Motion for Preliminary Injunction.

Plaintiff's counsel certifies that Defendant's counsel was contacted at least five days before this motion was filed to discuss the substance of this motion and any potential resolution of it. As also stated at the teleconference held on Plaintiff's Motion for Temporary Restraining Order, the parties were unable to reach a resolution.

In support of this Motion, Plaintiff submits the accompanying Brief and Exhibits, which are incorporated by reference as if fully set forth herein.

DISABILITY RIGHTS PENNSYLVANIA,

Dated: October 12, 2021

By: /*s*/ Morris A. Scott

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Morris Scott, hereby certify that a true and correct copy of Plaintiff's Motion for a Preliminary Injunction along with Plaintiff's Brief in Support of Motion for Preliminary Injunction, Proposed Order and Exhibits was filed via ECF and electronic notice was serviced upon Defendant's counsel:

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Counsel for Defendant, Saucon Valley School District

Date: October 12, 2021

/s/ Morris A. Scott
Morris A. Scott, Esquire