

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

Supreme Judicial Court  
for Suffolk County

Ronald Geddes, AC, and RAR,  
each on their own behalf and  
on behalf of a class of similarly situated  
individuals,

Plaintiffs,

v.

City of Boston; Boston Police Department;  
Boston Public Health Commission; Kim M.  
Janey, in her capacity as the Mayor of the City of  
Boston and individually; Gregory P. Long, in his  
Capacity as the Acting Commissioner of the  
Boston Police Department and individually; and  
Bisola Ojikutu, in her capacity as Executive  
Director of the Boston Public Health Commission  
and individually,

Defendants.

Civil Action No. SJ-2021-0408

**PLAINTIFFS' EMERGENCY MOTION FOR TEMPORARY  
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiffs hereby seek a temporary restraining order and preliminary injunction, pursuant to Mass. R. Civ. P. 65 and in accordance with Plaintiffs' requests for relief in the Verified Complaint filed on November 4, 2021, enjoining Defendants as set forth in the attached proposed Temporary Restraining Order/Injunction Order. Plaintiffs' request for a Temporary Restraining Order encompasses a request that an Order be issued as soon as possible to prevent ongoing harm.

As grounds for their motion, and as further set forth in the accompanying Memorandum of Law, the Verified Complaint, and the Affidavits of Cassie Hurd, Katy Naples-Mitchell, and Dr. Clare Landefeld, Plaintiffs state that they have been subjected to, and will continue to be subjected to, irreparable injury and the risk of further irreparable injury, unless and until Defendants' conduct that Plaintiffs have shown is likely in violation of law is temporarily or preliminarily enjoined as requested.

Plaintiffs also respectfully request that the Court issue a Summons and Order of Notice directing Defendants to appear on the earliest date that is convenient for the Court to show cause why the preliminary injunctive relief sought should not be issued.

Dated: November 5, 2021

Respectfully submitted,

/s/ Kevin S. Prussia

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 5, 2021, I served a true and correct copy of the above document via electronic mail upon all counsel of record in the above-referenced matter.

/s/ Kevin S. Prussia  
Kevin S. Prussia

**CERTIFICATE OF COMPLIANCE WITH SUPERIOR COURT RULE 9A(d)**

I certify that, in compliance with Sup. Ct. Rule 9A(d), that we have made a good faith effort to contact and confer with all parties regarding the subject of this motion, and Defendants indicate that they oppose the motion.

/s/ Kevin S. Prussia  
Kevin S. Prussia