

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:
LINDA BOUFERGUEN,	:
	:
Plaintiff,	:
	:
-versus-	: 20-cv-3975
	:
ANDREW CUOMO, as the Governor of New York;	:
and the CITY OF NEW YORK,	:
	:
Defendants.	:
-----X	:

NOTICE OF MOTION

PLEASE TAKE NOTICE that the plaintiff will move this Court, at a time and place designated by the Court, for a temporary restraining order enjoining the defendants from interfering, on the basis of an alleged violation of Executive Order 202.32 (May 21, 2020), with the plaintiff's protest on May 23, 2020 in the vicinity of City Hall so long as the protest involves no more than ten participants at a time and so long as participants remain at least six feet apart or are wearing face coverings. In support of this motion the plaintiff submits the Memorandum of Law in Support of Plaintiff's Motion for a Temporary Restraining Order (May 22, 2020); the Declaration of Linda Bouferguen (May 21, 2020); the Declaration of Christopher Dunn (May 22, 2020); the Declaration of Cary Mark Goodman (May 21, 2020); and the Declaration of Lourdes Chavez (May 22, 2020).

Respectfully submitted,

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION, by

s/Christopher Dunn
CHRISTOPHER DUNN
ANTONY GEMMELL

Dated: May 22, 2020
New York, N.Y.

125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
cdunn@nyclu.org