

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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LB, a Minor by his Mother and Next Friend,)
VG,)
)
Plaintiff,)
)
v.)
)
)
BRIAN A. O'CONNELL, KONSTANTIA B.)
LUKES, ROBERT A. BOGIGIAN, JOHN L.)
FOLEY, DOROTHY J.G. HARGROVE, JOHN)
F. MONFREDO, MARY J. MULLANEY,)
MAUREEN McCULLOUGH, ROBERT)
PEZZELLA, DR. DEIDRE LOUGHLIN, and)
MELINDA J. BOONE,)
)
Defendants.)
)
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Civil Action No.

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff LB, a minor, by and through his mother and next friend, VG, hereby moves, pursuant to Fed. R. Civ. P. 65, for entry of an order requiring Defendants to immediately reinstate LB in Worcester public schools, expunge his record of any school discipline from the incident at issue, and order Defendants to provide LB with whatever remedial or other academic assistance is required for LB to begin the ninth grade at the same academic level as when he was wrongfully suspended from school.

The grounds for this motion are set forth in Plaintiff's Verified Complaint and Plaintiff's Memorandum of Law, filed herewith.

WHEREFORE, Plaintiff respectfully requests that the Court grant the preliminary injunctive relief requested herein.

REQUEST FOR ORAL ARGUMENT

Plaintiff hereby requests oral argument on this motion as soon as possible.

Respectfully submitted,

LB, a Minor by his Mother and Next Friend,
VG,

/s/ John R. Baraniak, Jr.
John R. Baraniak, Jr. (BBO #552259)
Sarah A. Champion (BBO #670886)
CHOATE, HALL & STEWART LLP
Two International Place
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and

/s/ Jenny Chou
Jenny Chou (BBO #560420)
Joanne S. Karger (BBO #652181)
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Dated: July 15, 2009