

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

CRYSTAL ROBERTSON, on behalf of herself
and her minor child D.R.;

ELIZABETH DAGGETT, on behalf of herself
and her minor child H.D.;

JOANN MCCRAY, on behalf of herself and her
minor child J.C.;

VERONICA GUERRERO, on behalf of herself
and her minor child A.F.;

MARCIA CANNON-CLARK AND DAVID
CLARK, on behalf of themselves and their
minor child B.R.C; and

THE ARC OF THE UNITED STATES,

Plaintiffs,

v.

DISTRICT OF COLUMBIA,

Defendant.

Case No. 1:24-cv-00656

PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION

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Plaintiffs Crystal Robertson, on behalf of herself and her minor child D.R. and all others similarly situated; Elizabeth Daggett, on behalf of herself and her minor child H.D. and all others similarly situated; Joann McCray, on behalf of herself and her minor child J.C. and all others similarly situated; Veronica Guerrero, on behalf of herself and her minor child A.F. and all others similarly situated; Marcia Cannon-Clark and David Clark, on behalf of themselves and their minor child B.R.C and all others similarly situated; and the Arc of the United States ("Plaintiffs") respectfully move under Federal Rule of Civil Procedure 65 for a preliminary injunction requiring that Defendant District of Columbia halt its unlawful provision of unsafe, unreliable, and

inappropriate transportation services for students with disabilities and bringing Defendant into compliance with the Individuals with Disabilities in Education Act, the Rehabilitation Act, the Americans with Disabilities Act, and the District of Columbia Human Rights Act.

As set forth in the accompanying Plaintiffs' Memorandum in Support of Their Motion for Preliminary Injunction, Plaintiffs are entitled to a preliminary injunction because they are likely to succeed on the merits of their claims, they are suffering and will continue to suffer irreparable injury in the absence of the requested relief, the balance of equities tips in their favor, and the issuance of the injunction is in the public interest.

The grounds for this motion are fully set forth in Plaintiffs' accompanying brief in support of their motion for a preliminary injunction, and a proposed order is attached.

STATEMENT PURSUANT TO LOCAL CIVIL RULE 7(m)

Consistent with Local Rule 7(m), Plaintiffs contacted attorneys who represent the Defendant on March 13, 2024 to seek Defendant's consent to the relief requested herein. Defendant has not responded prior to filing as to whether it consents to the requested relief.

Dated: March 14, 2024

Respectfully submitted,

/s/Kaitlin R. Banner

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Counsel for Plaintiffs

*Certification to practice pursuant to Rule 83.2(f) submitted or to be submitted.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March 2024, I filed the foregoing document with the Clerk of Court using the CM/ECF system and mailed a courtesy copy by United States Postal Service to the Office of the Attorney General of the District of Columbia.

/s/ Margaret H. Warner
Margaret H. Warner