

**IN THE CIRCUIT COURT OF THE COUNTY OF ST. LOUIS
STATE OF MISSOURI**

STEPHANIE REYNOLDS, et al.,	)	
	)	
Plaintiffs,	)	
	)	
JAMES ZHANG,	)	
	)	Cause No. 06-CC-3802
Intervenor,	)	
	)	Division 13
v.	)	
	)	
CITY OF VALLEY PARK, et al.,	)	
	)	
Defendants.	)	

**MOTION OF DEFENDANTS TO DISMISS PLAINTIFFS'
MOTION FOR ORDER TO SHOW CAUSE AND CONTEMPT**

COME NOW Defendants, by and through their counsel, and, for their Motion, state:

1. Plaintiffs' prayer for relief seeks to enjoin Ordinance 1722 which was passed prior to the Court's decree, and its direct successor making it effective, Ordinance 1736. Such request for relief is beyond the jurisdiction of this Court as Plaintiffs seek to expand the final order issued by the Court in March, 2007, which enjoined only the enforcement of Ordinances 1708 and 1715.
2. Plaintiffs' Motion and prayer for relief seeks to place Defendants in contempt by implication and seeks relief beyond that set forth in the decree of the Court.
3. Plaintiffs' prayer does not ask for specific relief as to a per diem money fine or imprisonment.

WHEREFORE, premises considered, Defendants pray the Court dismiss Plaintiffs' Motion for Order to Show Cause and Contempt and for such other relief as the Court deems just.

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was mailed, first-class postage prepaid, this _____ day of September, 2007, to:

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