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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHILDREN'S HEALTH DEFENSE,
INC., PETER CORDI, RAELYNNE
MILLER, KAYLA MATEO, ADRIANA
PINTO, JAKE BOTHE, AND DOES 1-
13,

Plaintiffs,

-against-

RUTGERS, THE STATE UNIVERSITY
OF NEW JERSEY, BOARD OF
GOVERNORS, RUTGERS SCHOOL
OF BIOMEDICAL AND HEALTH
SCIENCES, CHANCELLOR BRIAN L.
STROM, PRESIDENT JONATHAN
HOLLOWAY, in their official capacities.

Defendants

Case No. 3:21-cv-15333
(ZNQ-TJB)

**NOTICE OF MOTION
FOR TEMPORARY
RESTRAINING ORDER
PURSUANT TO
FED. R. CIV. P. 65**

PLEASE TAKE NOTICE that on Monday, August 30, 2021, or thereafter and as soon as this Court will allow, Plaintiffs Children's Health Defense, Inc. and Adriana Pinto, through their undersigned attorney, shall

make application to this Court for emergency relief pursuant to *Fed. R. Civ. P. 65* and *L. Civ. R. 65.1*, seeking a temporary restraining order and/or preliminary injunction requiring Defendants to comply with the express terms of their own policy, Rutgers University Policy Section 10.3.14 concerning mandatory requirements and exemptions for COVID-19 vaccination.

Copies of Plaintiffs' moving papers shall have been served on opposing counsel contemporaneously with this notice and with Plaintiffs' application to the Court.

Dated: August 30, 2021

GOMEZ LLC
ATTORNEY AT LAW

By: s/ Julio C. Gomez
Julio C. Gomez, Esq.

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Attorney for Plaintiffs

CERTIFICATION OF SERVICE

I hereby certify that on this same date, I electronically filed the foregoing Notice of Motion For Temporary Restraining Order Pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1, a Legal Memorandum in support of the motion, Declarations of Counsel and Plaintiff Adriana Pinto with supporting exhibits, and a Proposed form of Order on behalf of Plaintiffs Childrens' Health Defense, Inc. and Adriana Pinto with the Clerk of the Court using the CM/ECF system, which shall forward a true copy of same to all counsel and parties participating therein for this matter.

I also certify that on this same date, I served all of the foregoing to the following attorney for Defendants via e-mail:

Steve Nolan, Esq. (snolan@ogc.rutgers.edu)
Associate Vice President and Deputy General Counsel
Office of the Senior Vice President and General Counsel
Rutgers, The State University of New Jersey
335 George Street – Suite 2160
New Brunswick, NJ 08901
Tel:848-932-7697

Dated: August 30, 2021

GOMEZ LLC
ATTORNEY AT LAW

By: s/ Julio C. Gomez
Julio C. Gomez, Esq.