



Petitioners require temporary injunctive relief before No. [redacted] of Defendants are not enjoined before No. [redacted] Petitioners Doe # [redacted] Doe # [redacted] and the Circuit Court of the [redacted] to prevent the immediate risk of fines, penalties, and criminal prosecution because they are unable to comply with the requirements of Article [redacted] Code Section [redacted] which requires the [redacted] to obtain and display unique identification decals for their manufactured homes. Petitioners Central Air Conditioning and Heating, Central Air Conditioning and Heating of Northern Virginia, and Central Air Conditioning and Heating of Virginia are unable to continue to suffer irreparable harm if they are forced to continue diverting scarce resources away from other programs in order to respond to this crisis.

As detailed in Petitioners' accompanying Memorandum, if temporary restraining orders and preliminary injunctions do not issue, Petitioners and the proposed Circuit Court will suffer irreparable injury, including the immediate loss of housing. Petitioners rely on the merits of their claims that Defendants' conduct violates the Fair Housing Act, 42 U.S.C. [redacted] and the Supremacy Clause of the U.S. Constitution. The threatened injury to Petitioners and the Circuit Court outweighs the [redacted] temporary injunction because the Defendants and the injunction would not [redacted] to the public interest.

Petitioners are filing this Motion concurrently with their Co-petitioners Doe # [redacted] and Doe # [redacted]'s Motion for Circuit Court Certification and Doe Petitioners' Motion for Leave to Proceed under Pseudonyms. Petitioners' counsel [redacted] arrange for hand delivery on No. [redacted] of each of these proceedings on Defendants and on Attorney General Luther Strange.

As a result to Plaintiffs in the presence of an injunction enjoining Defendants from enforcing Section of HB 15 by refusing to issue manufactured home identification decals to Plaintiffs Doe # Doe # and the Class Fed R Ci P 15 A. A though not required for immediate *ex parte* relief under Rule 15 Defendants were notified by hand delivery of the filing of this Motion on November Fed R Ci P 15 B.

In the event that the Court determines the hearing is necessary before ruling on Plaintiffs Motion for Temporary Restraining Order and Preliminary Injunction Plaintiffs request that the Court schedule the hearing as promptly as possible and sufficient in accordance of the November deadline established by A Code Section 15 in order for Plaintiffs Doe # Doe # and the Class to comply with their obligations under this statute should the Court grant the requested relief by enjoining Defendants enforcement of Section of HB 15.

For the foregoing reasons and as set forth in the accompanying Memorandum this Motion for Temporary Restraining Order and Preliminary Injunction should be granted.

Dated November

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing documents have been made to on this date de i er true and correct copy of the foregoing by hand delivery to the following parties at the e o addresses

Julie P. M. gee  
State Revenue Commissioner  
15 North Ripley Street  
Montgomery, AL

William M. Mi e Harper  
Etowah County Revenue Commissioner  
E Commerce Street Room  
P O Box  
Etowah, AL

I further certify that the foregoing documents have been made to on this date de i er true and correct courtesy copy of the foregoing by hand delivery to the State Attorney General at the e o addresses

Attorney General Luther Strange  
Office of the Attorney General State of AL  
15 Washington Ave  
Montgomery, AL

I so certify this 14th day of November 2014.

s/ Sue Broome  
Sue Broome