

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

LAILA DAMES, et al.,

*Plaintiffs,*

v.

No. 1:25-cv-191

LEE ROBERTS, et al.,

*Defendants.*

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, Plaintiffs Dames, Rogers, Newman, and Mohanarajah respectfully move for a preliminary injunction requiring Defendants to lift their bans from accessing UNC Chapel Hill's campus.

As demonstrated by the accompanying brief and exhibits in support of this Motion, a preliminary injunction is appropriate. Plaintiffs will likely prevail on the merits of their claims, they have suffered and will continue to suffer irreparable harm absent preliminary relief, the balance of the equities weigh in Plaintiffs' favor, and preliminary relief is in the public interest. Plaintiffs also move for waiver of security bond upon granting of the preliminary injunction.

WHEREFORE, Plaintiffs respectfully request that the Court grant Plaintiffs' motion for preliminary injunction, enjoining University and EEAC Defendants from (1) maintaining Plaintiffs' indefinite bans from campus; and, (2) summarily suspending and trespassing Plaintiffs from campus without meaningful notice and opportunity to be heard.

Respectfully submitted this, the 24 day of April, 2025.

**ACLU OF NORTH CAROLINA  
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*\*Notice of Special Appearance  
forthcoming*

**CERTIFICATE OF SERVICE**

I certify that on April 24, 2025, I filed the foregoing with the Clerk of the Court using the CM/ECF system which will effectuate service on all counsel of record.

/s/ Ivy A. Johnson

Ivy A Johnson

*Counsel for Plaintiffs*