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**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

SELINA SOULE, a minor, by Bianca Stanescu, her mother; CHELSEA MITCHELL, a minor, by Christina Mitchell, her mother; ALANNA SMITH, a minor, by Cheryl Radachowsky, her mother,

Plaintiffs,

v.

CONNECTICUT ASSOCIATION OF SCHOOLS, INC. d/b/a CONNECTICUT INTERSCHOLASTIC ATHLETIC CONFERENCE; BLOOMFIELD PUBLIC SCHOOLS BOARD OF EDUCATION; CROMWELL PUBLIC SCHOOLS BOARD OF EDUCATION; GLASTONBURY PUBLIC SCHOOLS BOARD OF EDUCATION; CANTON PUBLIC SCHOOLS BOARD OF EDUCATION; DANBURY PUBLIC SCHOOLS BOARD OF EDUCATION,

Defendants.

Case No. 3:20-cv-00201-RNC

**PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Dated: February 12, 2020

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs move this Court for a preliminary injunction against Defendants, as set out below. Plaintiffs request oral argument on their Motion.

Plaintiffs Selina Soule, Chelsea Mitchell, and Alanna Smith are elite level interscholastic track and field athletes. In this Motion, Plaintiffs challenge the Defendants' discriminatory Transgender Participation Policy that has enabled biological male athletes to displace them (along with other girls in competitive track and field events) from earned victories, honors, and opportunities for championship competition, as well as proper public recognition of their performances.

Plaintiffs request an injunction against Connecticut Association of Schools d/b/a Connecticut Interscholastic Athletic Conference (CIAC), and the Boards of Education for the Bloomfield, Cromwell, Glastonbury, Canton, and Danbury Public Schools, who have together acted to facilitate and enforce the discriminatory Policy that enables male athletes to participate in and dominate interscholastic girls' track and field competitions in Connecticut.

As presented more fully in their Memorandum in Support of Preliminary Injunction filed concurrently with this Motion, the design and effect of the Policy has denied and continues to deny equal athletic opportunity for female athletes including Plaintiffs, in violation of Title IX, 20 U.S.C. § 1681, and its implementing regulations. Absent equitable relief, each of the Plaintiffs will suffer further injury as a result of the Policy during the 2020 track and field season. The requested preliminary injunction is needed pending entry of a final order in this case due to

the irreparable harm attending the Plaintiffs' unrecoverable losses of athletic opportunity and attainment during the brief remaining portion of their high school athletic careers.

Plaintiffs submit that their petition for relief meets the standards for a preliminary injunction: Their case presents a likelihood of success on the merits; Plaintiffs will be irreparably harmed without the equitable relief they seek from this Court; the balance of hardship tips decisively in their favor as Defendants will not be harmed in any cognizable way by the requested injunction; and the injunction serves the public interest, as it would ensure conformity with a federal law serving an important public purpose.

Because a preliminary injunction presents no monetary risks to the Defendants, Plaintiffs request that no bond be required. Fed. R. Civ. P. 65(c).

Respectfully submitted this 12th day of February, 2020.

By: s/ Howard M. Wood III
Attorney for Plaintiffs

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**Pro hac vice admission pending*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion Preliminary Injunction, which was electronically filed in this case on February 12, 2020, will be served on all Defendants by service of process with the Verified Complaint and its accompanying documents.

/s/ Howard M. Wood III