

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR COURT  
CIVIL ACTION NO.  
18-\_\_\_\_\_

MASSACHUSETTS PEACE ACTION and  
MASSACHUSETTS PEACE ACTION EDUCATION FUND,

Plaintiffs,

v.

CITY OF CAMBRIDGE, MASSACHUSETTS and  
LOUIS DEPASQUALE,  
in his capacity as City Manager of the City of Cambridge,

Defendants.

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**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

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Plaintiffs, Massachusetts Peace Action and Massachusetts Peace Action Education Fund, two non-profit advocacy organizations, hereby ask this Honorable Court preliminary to enjoin the City of Cambridge (“the City”) from continuing to apply its policy which purports to authorize City officials to charge organizers of events in the public parks of Cambridge for public safety services.

Plaintiffs also request that the City be preliminarily enjoined to take all reasonable steps to relieve the Plaintiffs of responsibility for charges already assessed for public safety services provided at the January 20, 2018 Women’s March held on the Cambridge Common. Because continued application of the City’s policy chills the exercise of constitutionally protected free speech and assembly rights, there is an urgent need for preliminary injunctive relief.

This Motion is supported by the enclosed Memorandum in Support thereof.

Respectfully submitted on behalf of Plaintiffs,

Massachusetts Peace Action and  
Massachusetts Peace Action Education Fund



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Dated: July 2, 2018

### **Certificate of Service**

I, Ruth A. Bourquin, hereby certify that on this 3rd day of July, 2018, I caused a copy of this Motion for Preliminary Injunction and the Memorandum in support thereof to be served by hand delivery on the office of Nancy Glowa, City Solicitor, City of Cambridge, 795 Massachusetts Avenue, Cambridge, MA 02139.



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Ruth A. Bourquin