

COMMONWEALTH OF MASSACHUSETTS

21-2609-17

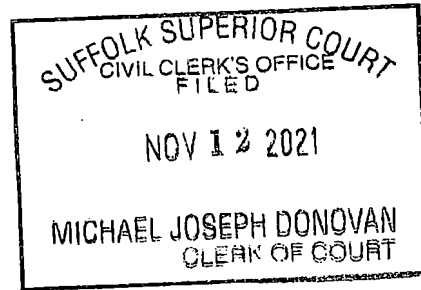
SUFFOLK, ss.

SUPREME JUDICIAL COURT
CIVIL ACTION NO. SJ-2021-0408

RONALD GEDDES, AC, and RAR, each on their own behalf and on behalf of a class of similarly situated individuals,

Plaintiffs,

vs.



CITY OF BOSTON; BOSTON POLICE DEPARTMENT; BOSTON PUBLIC HEALTH COMMISSION; KIM M. JANEY, in her capacity as the Mayor of the City of Boston and individually; GREGORY P. LONG, in his capacity as the Acting Commissioner of the Boston Police Department and individually; and Bisola Ojikutu, in her capacity as Executive Director of the Boston Public Health Commission and individually,

Defendants.

CITY OF BOSTON, BOSTON POLICE DEPARTMENT, KIM M. JANEY, IN HER CAPACITY AS MAYOR OF THE CITY OF BOSTON AND INDIVIDUALLY, AND GREGORY P. LONG, IN HIS CAPACITY AS THE ACTING COMMISSIONER OF THE BOSTON POLICE DEPARTMENT AND INDIVIDUALLY'S OPPOSITION TO PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Now come, the Defendants City of Boston, ("City") Boston Police Department, Kim M. Janey, in her capacity as the Mayor of the City of Boston and individually; Gregory P. Long, in his Capacity as the Acting Commissioner of the Boston Police Department and individually (collectively, the "City Defendants") and hereby oppose Plaintiffs' Ronald Geddes, AC, and

RAR's, on their own behalf on and behalf of a class of similarly situated individuals (the "Plaintiffs") Motion for a Temporary Restraining Order and Preliminary Injunction.

As grounds for their opposition, and as set forth in further detail in the accompanying memorandum of law and exhibits, the City Defendants submit to this Court that the Plaintiffs fail to meet the threshold requirements necessary to obtain a temporary restraining order or preliminary injunction because they lack standing, have not alleged the deprivation or threat of deprivation of any state or federal constitutional right, have not demonstrated that they will suffer irreparable harm, and because the public interest weighs heavily in favor of the City Defendants.

WHEREFORE, the City Defendants respectfully requests that the Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction be denied.

Respectfully submitted,

THE CITY OF BOSTON, THE BOSTON POLICE DEPARTMENT, KIM M. JANEY IN HER CAPACITY AS MAYOR OF THE CITY OF BOSTON AND INDIVIDUALLY, AND GREGORY P. LONG IN HIS CAPACITY AS ACTING COMMISSIONER OF THE BOSTON POLICE DEPARTMENT AND INDIVIDUALLY,

By their attorneys:
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Certificate of Service

I, Lisa Skehill Maki, certify that on November 9, 2021, the foregoing document was electronically mailed to the Supreme Judicial Court Clerk for Suffolk County for filing and was also electronically mailed to all counsel of record.

/s/ Lisa Skehill Maki
Lisa Skehill Maki