

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

SANDRA RODRÍGUEZ COTTO;
RAFELLI GONZÁLEZ COTTO,

Plaintiffs,

v.

WANDA VÁZQUEZ GARCED, Governor of
Puerto Rico; INÉS DEL C. CARRAU-
MARTÍNEZ, Interim Secretary of Department of
Justice of Puerto Rico; PEDRO JANER,
Secretary of Puerto Rico Department of Public
Safety; HENRY ESCALERA, Puerto Rico
Police Commissioner, all in their official
capacities,

Defendants.

Civil Action No.: 3:20-01235-PAD

PLAINTIFFS' RENEWED MOTION FOR PRELIMINARY INJUNCTION

COME NOW Plaintiffs Sandra D. Rodríguez Cotto and Rafelli González Cotto, through undersigned counsel, and respectfully state as follows:

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Sandra D. Rodríguez Cotto and Rafelli González Cotto move this Court for a preliminary injunction prohibiting Defendants, including all of Defendants' subordinates and other persons in active concert or participation with Defendants, from enforcing Section 6.14(a) of the Puerto Rico Department of Public Safety Act, both on its face and as applied to Plaintiffs. As more fully explained in the accompanying memorandum of law, a preliminary injunction is warranted because: (i) Plaintiffs are likely to succeed on their claim that Section 6.14(a) violates their rights under the First and Fourteenth Amendments; (ii) Plaintiffs will suffer irreparable harm if Section 6.14(a) is not enjoined; (iii) the balance of hardships tips strongly in Plaintiffs' favor; and (iv) the public interest will be served by a preliminary injunction enforcing the Constitution. Plaintiffs further request that, given the nature of the relief sought, bond be waived should the Court grant preliminary injunctive relief.

This Motion is based upon the Complaint filed in this case, the memorandum of law filed herewith, and the following documents:

1. Attached as Exhibit 1 is a true and accurate copy of the July 28, 2020, Second Declaration of Sandra D. Rodríguez Cotto.

2. Attached as Exhibit 2 is a true and accurate copy of the July 28, 2020, Second Declaration of Rafelli González Cotto

WHEREFORE, Plaintiffs respectfully request that the Court issue a preliminary injunction prohibiting Defendants from enforcing Section 6.14(a) of the Puerto Rico Department of Public Safety Act.

I HEREBY CERTIFY that the undersigned attorney electronically filed the foregoing with the Clerk of the Court, which will send notification of such filing to the parties subscribing to the CM/ECF System.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 29th day of July 2020.

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