M.C. et al., on behalf of themselves and all
similarly situated individuals,

               Plaintiffs,

     v.

JEFFERSON COUNTY, NEW YORK, et al.,

               Defendants.

Case No. 6:22-cv-190-DNH-ML

MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE THAT Plaintiffs in this action hereby move the Court pursuant

to Rule 65 of the Federal Rules of Civil Procedure for a preliminary order enjoining Defendants

to provide Plaintiffs and the putative class with agonist medication for opioid use disorder during

their detention in Defendants' custody, either as prescribed to them at their time of entry to

Defendants' custody, or as subsequently prescribed to them based on an appropriate clinical

evaluation by a physician licensed to prescribe methadone and buprenorphine.

This motion is based on the Memorandum of Law in Support of Plaintiffs' Motion for a

Preliminary Injunction; the Declaration of Antony P.F. Gemmell in Support of Plaintiffs' Motion

for a Preliminary Injunction; the Supplemental Declaration of Richard N. Rosenthal, M.D.; the

Declaration of Edmond Hayes; the Declarations of M.C., T.G., J.C., J.M., M.L., M.S.C, P.M.,

R.D., R.G., S.C., and S.G.; and the Class Action Complaint.

Pursuant to Local Rule 7.1(b)(5), Plaintiffs request oral argument. Plaintiffs believe oral

argument may assist the Court in weighing the factual and legal questions at issue on this

motion. Antony P.F. Gemmell, or another of Plaintiffs' counsel at the New York Civil Liberties

Union Foundation, will argue this motion for Plaintiffs.

Dated: April 6, 2022
      New York, New York

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NEW YORK CIVIL LIBERTIES UNION
  FOUNDATION

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