

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF NORTH DAKOTA  
WESTERN DIVISION

VANESSA DUNDON, JADE  
KALIKOLEHUAOKALANI WOOL,  
CRYSTAL WILSON, DAVID DEMO,  
GUY DULLKNIFE III, MARIAH MARIE  
BRUCE, FRANK FINAN, ISRAEL  
HOAGLAND-LYNN, and NOAH  
MICHAEL TREANOR,

on behalf of themselves and all similarly-  
situated persons,

Plaintiffs,

v.

KYLE KIRCHMEIER, MORTON  
COUNTY, CITY OF MANDAN, JASON  
ZIEGLER, STUTSMAN COUNTY,  
CHAD KAISER, and DOES 1-100,

Defendants.

No. 1:16-cv-406

**MOTION FOR TEMPORARY  
RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Plaintiffs, VANESSA DUNDON, JADE KALIKOLEHUAOKALANI WOOL,  
CRYSTAL WILSON, DAVID DEMO, GUY DULLKNIFE III, MARIAH MARIE  
BRUCE, FRANK FINAN, ISRAEL HOAGLAND-LYNN, and NOAH MICHAEL  
TREANOR, on behalf of themselves and all similarly-situated persons, file this Motion  
for a Temporary Restraining Order and Preliminary Injunction pursuant to Fed. R. Civ. P.  
65 and for the reasons stated in the accompanying Memorandum respectfully request that

this Court grant interim relief consisting of an order prohibiting Defendants from using excessive force in responding to the pipeline protests and prayer ceremonies and specifically prohibiting the use of SIM, explosive grenades, chemical agents, sound cannons, directed energy devices, and water cannons or hoses, as means of crowd dispersal. This motion will be based on the Memorandum and Exhibits being filed herewith and such further evidence or argument as may be presented.

Dated: Nov. 24, 2016

Respectfully submitted,

*/s/ Rachel Lederman*

By: RACHEL LEDERMAN, CA SBN 130192

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I, Rachel Lederman, hereby certify that on November 24, 2016, Plaintiffs' Memorandum and Exhibits in Support of this Motion were filed electronically with the Clerk of Court through ECF, and that ECF will send a Notice of Electronic Filing (NEF) to counsel of record.

Dated: Nov. 24, 2016

*/s/ Rachel Lederman*

RACHEL LEDERMAN