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8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **WESTERN DIVISION**  
11

12 CALIFORNIA EDUCATORS FOR  
MEDICAL FREEDOM, ARTEMIO  
13 QUINTERO, MIGUEL SOTELO,  
JANET PHYLLIS BREGMAN,  
14 CEDRIC JOHNSON, MISANON  
(SONI) LLOYD, HEATHER  
15 POUNDSTONE, and THERESA D.  
SANFORD,

16 Plaintiffs,

17 v.

18 THE LOS ANGELES UNIFIED  
SCHOOL DISTRICT, AUSTIN  
19 BEUTNER, in his official capacity as  
Superintendent of the Los Angeles  
20 Unified School District, and LINDA  
DEL CUETO, in her official capacity  
21 as the Director of Human Resources  
for the Los Angeles Unified School  
22 District,  
23

24 Defendants.

Case No.: 2:21-cv-02388-DSF-PVC

**PLAINTIFFS' NOTICE OF MOTION  
AND MOTION FOR PRELIMINARY  
INJUNCTION**

Date: May 17, 2021

Time: 1:30 p.m.

Judge: Hon. Dale S. Fischer

Courtroom: 7B

JW HOWARD/ ATTORNEYS LTD  
701 B STREET, SUITE 1725  
SAN DIEGO, CALIFORNIA 92101

1 TO DEFENDANTS THE LOS ANGELES UNIFIED SCHOOL DISTRICT,  
2 AUSTIN BEUTNER, IN HIS OFFICIAL CAPACITY AS SUPERINTENDENT OF  
3 THE LOS ANGELES UNIFIED SCHOOL DISTRICT, AND LINDA DEL CUETO,  
4 IN HER OFFICIAL CAPACITY AS THE DIRECTOR OF HUMAN RESOURCES  
5 FOR THE LOS ANGELES UNIFIED SCHOOL DISTRICT, AND THEIR  
6 ATTORNEYS OF RECORD:

7 PLEASE TAKE NOTICE THAT at 1:30 p.m. on May 17, 2021, or as soon  
8 thereafter as counsel may be heard in the courtroom of the Honorable Dale S. Fischer  
9 located at First Street Courthouse, 350 West 1st Street, Courtroom 7D, Los Angeles,  
10 California, Plaintiffs will move for an order for a preliminary injunction pursuant to  
11 Fed. R. Civ. P. 65 restraining and enjoining you, your officers, agents, servants,  
12 employees and attorneys, and all those in active concert or participation with you or  
13 them from enforcing a mandatory policy of vaccination against COVID-19, so long as  
14 the vaccines being so administered under such policy remain experimental. This  
15 motion will be made on the ground that immediate and irreparable injury will result to  
16 Plaintiffs unless the activities described above are enjoined pending trial of this action,  
17 and will be based on this Notice of Motion and Motion, the accompanying  
18 Memorandum of Points and Authorities, and the declaration of Artemio Quintero.

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20 Dated: April 15, 2021

JW HOWARD/ATTORNEYS

21  
22 /s/ John W. Howard  
23 John W. Howard  
24 Attorney for Plaintiffs  
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