

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

J.S., C.S., and A.S., minors,
by and through their mother,
S.S.

Plaintiffs,

v.

RED CLAY CONSOLIDATED
SCHOOL DISTRICT,

Defendant.

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C.A. No. _____

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

Plaintiffs hereby move for a temporary restraining order and preliminary injunction directing Red Clay Consolidated School District to cease violating the McKinney-Vento Homeless Education Assistance Improvements Act of 2001, 42 U.S.C. §§ 11431-11435 (“McKinney-Vento Act” or “the Act”) and provide them with the transportation assistance they need in order to attend the school in which they were enrolled when they were compelled to obtain temporary, shared housing because a medical disability rendered their mother temporarily unable to pay for housing.

The grounds for this motion are set forth in Plaintiffs’ Opening Brief in Support of their Motion for Temporary Restraining Order and Preliminary

Injunction.

Respectfully submitted,

/s/ Richard H. Morse

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