

STATE OF ILLINOIS
IN THE EIGHTH JUDICIAL CIRCUIT
ADAMS COUNTY

RONI QUINN, as the parent and guardian) of J.L.))) Plaintiff,)) Vs.))	Case No. 2020-MR-____
QUINCY PUBLIC SCHOOL BOARD) OF EDUCATION.) a body politic.)) Defendants.))	

**PLAINTIFF'S VERIFIED MOTION FOR A
PRELIMINARY INJUNCTION**

Plaintiff, RONI QUINN, as the parent and guardian of her minor child, J.L., by and through her attorneys, Thomas G. DeVore, Erik D. Hyam, and the Silver Lake Group, Ltd., for the reasons set forth in her Verified Complaint, pursuant 735 ILCS 5/11-102, which is adopted and incorporated herein by reference, respectfully requests this Court issue a preliminary injunction against Defendant. In support of her Motion, Plaintiff states as follows:

1. As set forth more fully in the Verified Complaint, on July 08, 2020, the Superintendent of the District published certain generalized mandates which Plaintiff's minor child must comply when school begins for the 2020-2021 school year or she will be denied access inside the public school building to receive an education.

2. The District has promulgated mandates beyond its authority and which are otherwise in violation of Illinois law.

3. Plaintiff has a right to insist the District not promulgate mandates beyond its authority and which are otherwise in violation of Illinois law which place an unlawful restraint on the Plaintiffs right of her minor child to have access to an in-person education within the public-school building.

4. Absent the issuance of this restraining order, the District's mandates will result in immediate and irreparable harm to Plaintiff's minor child's right to receive an in-person education inside the public school building until such time as this Court can enter a final ruling on the merits.

5. Plaintiff has no adequate remedy at law because she is forced with the dilemma of either accepting the District's mandates or jeopardize her minor child's access to an in-person education within the public school building.

6. Plaintiff, and her minor child, clearly have protectable rights and interests at stake to have access to an in-person education inside the public-school building with is not restrained by mandates which are beyond the authority of the District to promulgate and otherwise in violation of Illinois law.

7. As provided in Plaintiff's memorandum in support of this restraining order, which document is incorporated herein by reference, Plaintiff is likely to succeed on the merits that the mandates are beyond the authority of the District to promulgate or are otherwise in violation of Illinois law.

WHEREFORE, the Plaintiff respectfully prays this Court enter an order that provides for:

- A. Entry of a Temporary Restraining Order immediately enjoining the District from denying Plaintiff's minor child's access within its public-school building for in-person learning unless a face-mask is worn by the minor child; and

- B. Entry of a Temporary Restraining Order immediately enjoining the Board from denying Plaintiff's minor child's access within its public-school building for in-person learning unless the minor child consents to a temperature check; and
- C. Such further relief as this Court deems just and equitable.

Respectfully submitted,

RONI QUINN,
as the parent and guardian of
J.L. Plaintiff.

By: /s/ Thomas G. DeVore
One of Her Attorneys

Verification

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned, certifies that the statements set forth in this Verified Complaint for Declaratory Judgment and Injunctive Relief are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

July 09, 2020
Date

/s/ Roni Quinn
RONI QUINN

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