STATE OF RHODE ISLAND
PROVIDENCE, SC

SUPERIOR COURT

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| JANE DOE, | : | |
| Plaintiff; | : | |
| vs. | : | C.A. No. PC2025- |
| ANGÉLICA INFANTE-GREEN, in her capacity as the Commissioner of Elementary and Secondary Education, Rhode Island Department of Education | : | |
| Defendant. | : | |

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed R. Civ. P. 65, Plaintiffs hereby move for a preliminary injunction against Defendant, Angélica Infante-Green, in her capacity as the Commissioner of Elementary and Secondary Education, to the effect:

1. That Commissioner of Elementary and Secondary Education Regulation 200-RICR-30-10-1 ("Commissioner's Regulation") be declared ultra vires and void as beyond the statutory powers of the Commissioner to issue;
2. That any and all policy guidance protocol currently in place which reply upon the Commissioner's Regulation be declared ultra vires and void;
3. That Plaintiffs be awarded costs, and attorney's fees for prosecuting this motion.

The reasons for said motion are more fully set forth in the attached memorandum of law.

Plaintiff,
By her Attorney,

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