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8 Attorneys for Plaintiff Daymon Johnson

9 UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF CALIFORNIA

11 DAYMON JOHNSON,

12 *Plaintiff,*

13 v.

14 STEVE WATKIN, et al.,

15 *Defendants.*

Case No. 1:23-cv-00848-CDB

PLAINTIFF’S NOTICE OF MOTION  
AND MOTION FOR PRELIMINARY  
INJUNCTION

17 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

18 PLEASE TAKE NOTICE THAT Plaintiff Daymon Johnson will and hereby does  
19 respectfully move pursuant to Fed. R. Civ. P. 65(a) for a preliminary injunction, said motion which  
20 he proposes to notice for a hearing on August 24, 2023 at an as-yet to be determined courtroom,  
21 prohibiting Defendants, their officers, agents, servants, employees, and all those acting in concert  
22 with them who receive notice of the injunction, from enforcing Cal. Educ. Codes §§ 87732 and  
23 87735 and Kern Community College District Board Policy 3050 against Plaintiff Johnson on the  
24 basis of the content and viewpoint of his speech on political and social issues, and further enjoin  
25 Defendants, their officers, agents, servants, employees, and all those acting in concert with them  
26 who receive notice of the injunction, from enforcing Cal. Code of Regs., tit. 5, §§ 51200, 51201,  
27 53425, 53601, 53602, and 53605, pending final judgment.  
28

1 The grounds for this motion are set forth in the accompanying Memorandum of Points and  
2 Authorities, and declarations and exhibits in support which are being filed together with this motion  
3 and are expressly incorporated by reference herein.

4 Date: July 13, 2023

Respectfully submitted,

5 By: /s/ Alan Gura  
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