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10	Telephone: (202) 265-7337		
11	Email: pdinerstein@peer.org		
12 13	Attorneys for Plaintiff Public Employees	for Environmental Responsibility	
14			
15	OF CALIFORNIA – WESTERN DIVISION		
16	AMERICA UNITES FOR KIDS, et al.,	CASE NO. 2:15-cv-02124-PA-AJW	
17	Plaintiffs,	PLAINTIFFS' NOTICE OF	
18	V. CANIDDA I VON et el	MOTION AND MOTION FOR A PRELIMINARY INJUNCTION	
19	SANDRA LYON, et al., Defendants.		
20	Defendants.	[Filed Concurrently With Memorandum of Points and Authorities and	
21		Declarations of Paula Dinerstein, Jennifer DeNicola, Beth Lucas, Jude Brown,	
22		Caren Leib, Lisa Lambert, Hope	
23		Edelman, Kathy Feig, Soniya Perl, Gisselle Borress, Paul Rosenfeld, Ph.D.,	
24		Brigette Leonard]	
25		Hearing Date: May 4, 2015	
26		Hearing Time: 1:30 p.m. Judge: Hon. Percy Anderson	
2728		Courtroom: 15 Complaint filed: March 23, 2015	
40		Complaint med. March 23, 2013	

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TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that at 1:30 p.m., on May 4, 2015, or as soon thereafter as counsel may be heard, in the courtroom of the Honorable Percy Anderson, United States District Judge, Plaintiffs America Unites for Kids and Public Employees for Environmental Responsibility ("Plaintiffs") will move for an order for preliminary injunction pursuant to Fed. R. Civ. P. 65: (1) restraining and enjoining Defendants Sandra Lyon, in her official capacity as Superintendent of the Santa Monica Malibu Unified School District (the "District"), Jan Maez, in her official capacity as the District's Associate Superintendent and Chief Financial Officer, and Laurie Lieberman, Dr. Jose Escarce, Craig Foster, Maria Leon-Vazquez, Richard Tahvildaran-Jesswein, Oscar De La Torre, and Ralph Mechur, in their official capacities as members of the District's Board Of Education (collectively, "Defendants"), and their agents, or employees from using MHS room nos. 3, 7, 401, 505, 704 (interior) and 704 (exterior hallway), and JCES room nos. 18, 19, 22 and 23 for any educational purpose until the remediation described in (2) below is completed; and (2) required to remove and dispose of all caulk, and remediate any other materials contaminated with PCBs, in those rooms in accordance with TSCA and regulations thereunder by July 31, 2015.

This motion will be made on the grounds that Plaintiffs have established all the requirements for issuance of such preliminary injunctive relief, including that Plaintiffs' members and supporters will suffer immediate and irreparable injury unless the requested preliminary injunctive issues pending trial of this action. This motion will be based on the Notice of Motion, the accompanying Memorandum of Points and Authorities, the accompanying Declarations of Jennifer DeNicola, Paula Dinerstein, Paul Rosenfeld, Ph.D., Beth Lucas, Hope Edelman, Caren Leib, Soniya Perl, Jude Brown, Lisa Lambert, Brigette Leonard, Kathy Feig, Gisselle Borress, the pleadings and records on file herein, and all other matters that may properly be

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1	considered by the Court before or at the time of the hearing.	
2 3		Respectfully submitted,
4	Dated: April, 2015	NAGLER & ASSOCIATES
5	Dated. April, 2013	WAGEER & ASSOCIATES
6		By: Mar Mar
7		Charles Avrith
8		Attorneys for Plaintiffs America Unites for Kids and Public Employees for Environmental Responsibility
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10	Dated: April	PAULA DINERSTEIN
11		raderish, le
12		Attorneys for Plaintiff Public Employees for
13		Environmental Responsibility
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PLAINTIFFS' NOTICE OF MOTION FOR A PRELIMINARY INJUNCTION