

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

<p>NEAL MORRIS,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>The CITY OF NEW ORLEANS,</p> <p style="text-align: right;">Defendant</p>	<p>CIVIL ACTION NO.:</p> <p>JUDGE:</p> <p>MAGISTRATE JUDGE:</p>
--	---

---

**MOTION FOR PRELIMINARY INJUNCTION**

---

**NOW INTO COURT** come Plaintiff Neal Morris, and for the reasons set forth in their Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction, move this Court, pursuant to Fed. R. Civ. P. 65(a), for a preliminary injunction restraining, enjoining and/or prohibiting Defendant, the City of New Orleans, and/or and its agents, representatives, or anyone acting on its behalf, from enforcing its murals-permit scheme, i.e. New Orleans Comprehensive Zoning Ordinance §216.V et seq. and New Orleans Municipal Code § 134-78A et seq. Plaintiff seeks this Order pending disposition of Plaintiff's claim that the murals-permit scheme violates the First Amendment of the Constitution of the United States, made applicable to the

States through the Due Process Clause of the Fourteenth Amendment, and that it violates the Due Process Clause of the Fourteenth Amendment, and that the scheme, as applied, violates the Equal Protection Clause of the Fourteenth Amendment.

In support of his motion, Plaintiff submits the attached Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction, and a proposed Order.

Respectfully submitted by:

*/s/ Bruce Hamilton*

Bruce Hamilton, La. Bar No. 33170  
ACLU Foundation of Louisiana  
P.O. Box 56157  
New Orleans, Louisiana 70156  
Telephone: (504) 522-0628  
Facsimile: (888) 534-2996  
Email: [bhamilton@laaclu.org](mailto:bhamilton@laaclu.org)

And

RONALD L. WILSON, La. Bar No. 13575  
ACLU Foundation of Louisiana  
COOPERATING ATTORNEY  
701 Poydras Street – Suite 4100  
New Orleans, Louisiana 70139  
Telephone: (504) 525-4361  
Facsimile: (504) 525-4380  
Email: [cabral2@aol.com](mailto:cabral2@aol.com)