

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

MICHELLE E. DE SOUSA, *et al.*,  
Plaintiffs,

v.

SMART726, *et al.*,  
Defendants.

Civil Action No. 24-cv-1653

Judge Stickman

**FILED UNDER SEAL**

**MOTION FOR PRELIMINARY INJUNCTION**

In connection with this Court’s December 11, 2024, Temporary Restraining Order, Plaintiffs now move this Court for an Order granting the Motion for a Preliminary Injunction against the Defendants identified on **Schedule “A”** to the Complaint and attached hereto (collectively, the “Defendants”). The legal support for this motion is contained in the Memorandum of Law. The evidence supporting this motion is contained in the Declarations of Jose De Jesus De Sousa, Stanley D. Ference III, Brian Samuel Malkin, and Dee Odell, and the exhibits attached thereto. A proposed Order affirmatively granting the relief sought herein is filed herewith.

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Dated: December 18, 2024

Respectfully submitted,

/s/ Stanley D. Ference III

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