

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.

FILED UNDER SEAL

MOTION FOR 1) TEMPORARY RESTRAINING ORDER; 2) ORDER RESTRAINING ASSETS AND MERCHANT STOREFRONTS; 3) ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE; AND 4) ORDER AUTHORIZING EXPEDITED DISCOVERY

Plaintiff now moves this Court for an Order granting its *Ex Parte* Application for: 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts (as defined *infra*); 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against the Defendants identified on **Schedule “A”** to the Complaint (collectively, the “Defendants”). The legal support for this motion is contained in the accompanying 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, filed therewith, and the exhibits attached thereto. A proposed order is filed herewith.

Respectfully submitted,

Dated: December 10, 2024

/s/ Stanley D. Ference III

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