

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

PHILLIP BEVERLY, et al.,	)	
	)	
Plaintiffs,	)	Case No. 1:14-CV-04970
	)	
v.	)	Judge Joan B. Gottschall
	)	
WAYNE D. WATSON, et al.,	)	Magistrate Judge Sheila Finnegan
	)	
Defendants.	)	

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**PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs Phillip Beverly and Robert Bionaz ask that this Court immediately enter a preliminary injunction against Defendants Wayne D. Watson, Patrick Cage, and Janelle Carter, and in support hereof, Plaintiffs respectfully state as follows:

1. As set forth more fully in Plaintiffs’ Memorandum of Points and Authorities in Support of Motion for Preliminary Injunction filed contemporaneously herewith, Defendants have attempted, and continue to attempt to silence Plaintiffs’ speech in violation of the First Amendment, thereby causing immediate and irreparable harm.

2. Also, as set forth more fully in the Memorandum, Plaintiffs have a substantial likelihood of success on the merits in this lawsuit, there is no remedy at law, and the requested injunction will not harm the public interest.

WHEREFORE, Plaintiffs request that this Court immediately enter a preliminary injunction against Defendants Wayne D. Watson, Patrick Cage, and Janelle Carter barring them from any attempt to (1) interfere with or shut down the *CSU Faculty Voice* blog, including without limitation, sending “cease and desist” letters or contacting in any manner connected with the blog any entity that hosts *CSU Faculty Voice*; (2) impose sanctions on Plaintiffs for publication of the *CSU Faculty Voice* or other expression critical of Chicago State University

(“CSU”) administrators; and (3) enforce CSU’s Computer Usage Policy or Cyberbullying Policy, or any other CSU regulation or policy, against any conduct or expression unless it is (a) unprotected by the First Amendment under established law, or (b) so severe, pervasive, and objectively offensive as to constitute harassment as a matter of law, as articulated in *Davis v. Monroe County Bd. of Educ.*, 526 U.S. 629, 633 (1999).

DATED: December 31, 2014

Respectfully submitted,

/s/ Robert Corn-Revere  
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