

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND**

**MARYLAND SHALL ISSUE, INC., *et al.*,
9613 Harford Rd., Ste C #1015
Baltimore, Maryland 21234-2150,**

Plaintiffs,

No.: 1:22-cv-00865-SAG

v.

**ANNE ARUNDEL COUNTY,
MARYLAND
44 Calvert Street
Annapolis, MD 21401,**

Defendant.

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION AND
TEMPORARY RESTRAINING ORDER, OR,
IN THE ALTERNATIVE, FOR SUMMARY JUDGMENT**

Plaintiffs respectfully move this Court for an order granting a preliminary injunction and temporary restraining order (TRO) that enjoins defendant Anne Arundel County, Maryland, from enforcing Bill 108-21. Alternatively, plaintiffs respectfully move this Court for an order granting summary judgment and entering declaratory and permanent injunctive relief enjoining defendant Anne Arundel County from enforcing Bill 108-21. These motions are supported by the accompanying declarations of each of the named plaintiffs. For the reasons set forth in the accompanying supporting memorandum of law, these motions should be granted.

Respectfully submitted,

/s/ Mark W. Pennak

MARK W. PENNAK
MARYLAND SHALL ISSUE, INC.
9613 Harford Rd
Ste C #1015
Baltimore, MD 21234-21502
mpennak@marylandshallissue.org
Phone: (301) 873-3671

MD Atty No. 1905150005
District Court Bar No. 21033

/s/ Edward N. Hershon

EDWARD N. HERSHON
HERSHON LEGAL, LLC
420-I Chinguapin Round Rd.
Annapolis, MD 21401
ed@hershonlegal.com
Phone: (443) 951-3093

MD Atty No. 9306230157
District Court Bar No. 22606

Counsel for Plaintiffs