

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

BAHIA AMAWI

Plaintiff,

vs.

**PFLUGERVILLE INDEPENDENT SCHOOL
DISTRICT**; and

KEN PAXTON, in his official capacity as
Attorney General of Texas,

Defendants.

Case No. 1:18-cv-01091-RP

**NOTICE OF MOTION FOR A
PRELIMINARY INJUNCTION**

ORAL HEARING REQUESTED

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

TO DEFENDANTS PFLUGERVILLE INDEPENDENT SCHOOL DISTRICT AND
ATTORNEY GENERAL KEX PAXTON, AND THEIR COUNSEL:

PLEASE TAKE NOTICE that as soon as the matter may be heard, in the courtroom of the Honorable Robert Pitman at the United States District Court for the Western District of Texas, 501 West 5th Street, Suite 5300, Austin, TX 78701, Plaintiff Bahia Amawi hereby applies to the Court for a preliminary injunction. This motion is brought pursuant to Fed R. Civ. P. 65(a), W.D. Tex. L.R. 7 and 65, 42 U.S.C. § 1983, and the First and Fourteenth Amendments of the U.S. Constitution.

Plaintiff's motion seeks to enjoin Defendants' enforcement of H.B. 89, as codified at Tex. Gov. Code § 2270.001 *et. seq.*, "State Contracts with and Investments in Companies that Boycott Israel" as facially unconstitutional. It further seeks to enjoin Pflugerville Independent School District's inclusion of a "No Boycott of Israel" clause in Plaintiff Bahia Amawi's annual contract with the District for speech language pathology services so that Amawi can sign it and resume her work with the children in PFISD schools.

This motion is based on this Notice of Motion, the supporting Memorandum, the supporting declarations of Bahia Amawi and Gadeir Abbas, with accompanying exhibits, and all such further written materials and oral arguments as may be presented to the Court.

Defendants are being served with the Complaint, Summons, and this Motion for a Preliminary Injunction in conjunction with this filing; counsel for Defendants has not yet appeared. Plaintiffs will file a proof of service as soon as service is complete.

Respectfully submitted,

Dated: December 21, 2018

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α *Pro hac vice admission pending*

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