

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

RAMAPOUGH MOUNTAIN INDIANS,  
INC.,

and

RAMAPOUGH LENAPE NATION,

*Plaintiffs*

v.

TOWNSHIP OF MAHWAH,

RAMAPO HUNT & POLO CLUB  
ASSOCIATION, INC.

GERALDINE ENTRUP,

THOMAS MULVEY,

JOHN and JANE DOES 1 THROUGH  
14,

JOHN DOE ENTITIES 1 AND 2

*Defendants*

Civil Action No. 2:18-cv-09228

**THIS MATTER** having been presented to the Court upon Verified Complaint of the Ramapough Mountain Indians, Inc. and the Ramapough Lenape Nation, by counsel, by way of an application, with affidavits and evidence in support, for an Order to Show Cause seeking temporary restraints pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1; and the Court having considered the accompanying Verified Complaint and Memorandum of Law in Support of Plaintiff's Motion for a Temporary Restraining Order, and good cause appearing,

**IT IS** on this \_\_\_\_ day of June, 2018, **ORDERED** as follows:

1. Defendants Township of Mahwah, Ramapo Hunt & Polo Club, Geraldine Entrup, and Thomas Mulvey shall appear before this Court on \_\_\_\_\_, 2018 at \_\_\_\_\_ a.m/p.m. or as soon thereafter as counsel may be heard at the United States District Court for the District of New Jersey, Martin Luther King Building & United States Courthouse, 50 Walnut Street, Room 4015 before the Honorable Claire Claudia Cecchi, United States District Court Judge, to show cause why this Court should not enter an Order as follows:

a. Immediately restraining and enjoining defendants, whether alone or in concert with others, including officers, agents, affiliates, subsidiaries, successors, attorneys, and all those in active concert or

participation with it, from actual enforcement, self-help, or imposing cumulative fines against Ramapough Mountain Indians, Inc. or the Ramapough Lenape Nation for the purpose of prohibiting prayer and assembly at Ramapough land at 95 Halifax Road, Mahwah, NJ 07430, and be prohibited from actual enforcement, self-help, or imposing fines to directly, or indirectly, to force the demolition and removal of Ramapough's Stone Altar and Prayer Circle at 95 Halifax Road, Mahwah, NJ 07430;

b. An order staying local proceedings in the Mahwah municipal court of *NJ v. Ramapo Mountain Indians, Inc.*, starting with Case No. SC 2018-8762 to present, arising from the issuance of summonses declaring prayer and assembly and the Ramapough's Stone Altar and Prayer Circle at 95 Halifax Road, Mahwah, NJ 07430 to be violations of the Mahwah town zoning ordinance;

c. Immediately enjoining, restraining and prohibiting defendants from pursuing a prohibition of assembly, with or without prayer, by Ramapough and invited guests at 95 Halifax Road in Mahwah, NJ as injunctive relief in the pending State Court actions entitled *Mahwah v. Ramapough Mountain Indians, Inc.*, Bergen County Superior Court No.

BER-L-003189-17 and *Ramapo Hunt & Polo Club Association, Inc. v.*

*Ramapough Mountain Indians, Inc. and Township of Mahwah, Bergen*

County Superior Court No. BER-L-006409-17 or from attempting to enforce

any Order or Judgement, or collect fines, that may be issued in such cases

arising from allegations that assembly, with or without prayer at 95 Halifax

Road, Mahwah, NJ 07430 are in violation of the Mahwah municipal code;

d. Immediately enjoining, restraining and prohibiting defendants from demanding an immediate demolition and removal of the Ramapough Stone Altar and Prayer Circle at 95 Halifax Road in Mahwah, NJ in the pending State Court actions entitled *Mahwah v. Ramapough Mountain Indians, Inc.*, Bergen County Superior Court No. BER-L-003189-17 and *Ramapo Hunt & Polo Club Association, Inc. v. Ramapough Mountain Indians, Inc. and Township of Mahwah*, Bergen County Superior Court No. BER-L-006409-17 or from attempting to enforce any Order or Judgement that may be issued in such cases arising from allegations that the Ramapough's Stone Altar and Prayer Circle at 95 Halifax Road, Mahwah, NJ 07430 are violations of the Mahwah municipal code;

e. Immediately enjoining, restraining and prohibiting defendants from issuing further Summonses related to assembly, with or

without prayer or related to the Stone Altar, or Prayer Circle or from attempting to enforce any Order or Judgement, or collect any fines, that may be issued in the Mahwah municipal court, arising from Mahwah's allegations that the Mahwah municipal code prohibits assembly and prayer at 95 Halifax Road, Mahwah, New Jersey, and that the Ramapough Stone Altar and Prayer Circle at 95 Halifax Road, Mahwah, New Jersey are violations of the Mahwah municipal code;

f. That no bond shall be required of Ramapough Lenape Nation or Ramapough Mountain Indians, Inc. given the United States Constitutional rights at issue and that there is no monetary harm to defendants.

g. Granting such other and further relief as the Court deems just and proper.

2. Pending the return of this Order to Show Cause, a Temporary Restraining Order is hereby entered as follows:

a. Defendants Mahwah, Geraldine Entrup, and Thomas Mulvey and agents are immediately restrained and enjoined, whether alone or in concert with others, including officers, agents, affiliates, subsidiaries,

successors, attorneys, and all those in active concert or participation with it, from actual enforcement, self-help, or imposing cumulative fines against Ramapough Mountain Indians, Inc. or the Ramapough Lenape Nation for the purpose of prohibiting prayer and assembly at Ramapough land at 95 Halifax Road, Mahwah, NJ 07430, and prohibited from actual enforcement, self-help, or imposing fines to directly, or indirectly, to force the demolition and removal of Ramapough's Stone Altar and Prayer Circle at 95 Halifax Road, Mahwah, NJ 07430;

b. A stay of local proceedings in the Mahwah municipal court of *NJ v. Ramapo Mountain Indians, Inc.*, starting with Case No. SC 2018-8762 to present, arising from the issuance of summonses declaring prayer and assembly and the Ramapough's Stone Altar and Prayer Circle at 95 Halifax Road, Mahwah, NJ 07430 to be violations of the Mahwah town zoning ordinance;

c. Defendants Mahwah and Polo Club are enjoined, restrained and prohibited from pursuing a prohibition of assembly, with or without prayer, by Ramapough and invited guests at 95 Halifax Road in Mahwah, NJ as injunctive relief in the pending State Court actions entitled

*Mahwah v. Ramapough Mountain Indians, Inc.*, Bergen County Superior Court No. BER-L-003189-17 and *Ramapo Hunt & Polo Club Association, Inc. v. Ramapough Mountain Indians, Inc. and Township of Mahwah*, Bergen County Superior Court No. BER-L-006409-17 or from attempting to enforce any Order or Judgement, or collect fines, that may be issued in such cases arising from allegations that assembly, with or without prayer at 95 Halifax Road, Mahwah, NJ 07430 are in violation of the Mahwah municipal code;

d. Defendants Mahwah and Polo Club are enjoined, restrained and prohibited from demanding an immediate demolition and removal of the Ramapough Stone Altar and Prayer Circle at 95 Halifax Road in Mahwah, NJ in the pending State Court actions entitled *Mahwah v. Ramapough Mountain Indians, Inc.*, Bergen County Superior Court No. BER-L-003189-17 and *Ramapo Hunt & Polo Club Association, Inc. v. Ramapough Mountain Indians, Inc. and Township of Mahwah*, Bergen County Superior Court No. BER-L-006409-17 or from attempting to enforce any Order or Judgement that may be issued in such cases arising from allegations that the Ramapough's Stone Altar and Prayer Circle at 95

Halifax Road, Mahwah, NJ 07430 are violations of the Mahwah municipal code;

e. Defendant Mahwah is enjoined, restrained and prohibited from issuing further Summonses related to assembly, with or without prayer or related to the Stone Altar, or Prayer Circle or from attempting to enforce any Order or Judgement, or collect any fines, that may be issued in the Mahwah municipal court, arising from Mahwah's allegations that the Mahwah municipal code prohibits assembly and prayer at 95 Halifax Road, Mahwah, New Jersey, and that the Ramapough Stone Altar and Prayer Circle at 95 Halifax Road, Mahwah, New Jersey are violations of the Mahwah municipal code;

f. No bond shall be required of Ramapough Lenape Nation or Ramapough Mountain Indians, Inc. given the United States Constitutional rights at issue and as the granting of a temporary restraining order does no monetary harm to defendants.

g. This Order shall remain in full force and effect until such time as the Court specifically orders otherwise; and

h. A copy of this Order to Show Cause, along with all documents upon which the Order is based, shall be personally served upon Defendants on or before June \_\_\_\_\_, 2018.

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United States District Judge