

**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 (CCC)(JBC)

**NOTICE OF MOTION FOR
TEMPORARY RESTRAINING
ORDER AND REQUEST FOR
PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure and Rule 65.1 of the Local Civil Rules of the United States District Court for the District of New Jersey, Plaintiff Ramapough Lenape Nation and Ramapough Mountain Indians, Inc. requests a Temporary Restraining Order and request for Preliminary

Injunction enjoining Defendants Township of Mahwah and Ramapo Hunt & Polo Club from actions violating, abridging, hindering or burdening Plaintiff's rights to prayer, to assemble and from actions demanding penalizing or demanding the demolition and removal of Ramapough's Sacred Altar and Prayer Site at 95 Halifax Road, Mahwah, New Jersey.

For the reasons set forth in Plaintiff's Memorandum in Support, Ramapough will (1) a likely of succeed on the merits of the underlying petition, (2) face irreparable harm if a stay is not granted, (3) suffer potential harm outweighing the harm to Mahwah and the Polo Club if a stay is not granted, and, furthermore, say in support that (4) a granting of the stay would serve the public interest", *Douglas v. Ashcroft*, 374 F.3d 230 (3rd Cir. 2004); *Highmark, Inc. v. Upmc Health Plan*, 276 F.3d 160 (3rd Cir. 2001).

WHEREFORE, Plaintiff Ramapough respectfully requests that this Court grant a temporary restraining order and request for preliminary injunction.

Respectfully Submitted,

/s/ Valeria A. Gheorghiu

Valeria A. Gheorghiu, No. 042912007
Law Office of Valeria A. Gheorghiu
113 Green Street, Ste. 2
Kingston, NY 12401
(914) 772-7194

*Attorney for Plaintiffs Ramapough Mountain Indians, Inc., and
Ramapough Lenape Nation*