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United States District Court

District of Oregon

Portland Division

Alexandra Helene Morrison, by and through
her Guardian *ad litem* and father,
David Mark Morrison, and
David Mark Morrison, individually,

v.

Portland Public Schools,
Defendant.

Civil Action No. Cv 11-739-MO

Preliminary Injunction Motion

Pursuant to Fed. R. Civ. P. 26(c)(1)
Request for Oral Argument
Expedited Hearing Requested

Plaintiffs Alexandra Morrison and her father David Morrison move for a preliminary injunction. FRCP 65. Morrison files concurrently its *Complaint for Declaratory and Injunctive Relief*, and *Memorandum in Support of Preliminary Injunction Motion*.

This Motion is supported by the Declarations of Shawn E. Abrell, Curtis Bennett (Engineering Technologist, Journeyman Electrician with theoretical and practical background in electromagnetic field design, and thermal imaging authority), David O. Carpenter, M.D. (Director, Institute For Health and the Environment University; presenter to the President's Cancer Panel), Lloyd Morgan (Senior Research Fellow, Environmental Health Trust; a Director of the Central Brain Tumor Registry), and Barrie Trower (trained by the British Military in all aspects of microwave warfare; was a Government agent to professionally recover secret information from terrorists, master criminals, foreign agents/spies, and dissidents and taught advanced physics, science and mathematics at South Dartmore College for students and adults) incorporated herein.

As set out fully in the *Complaint* and *Memorandum*, Alexandra and David Morrison complain against Portland Municipal Schools for its policy of using WI-FI.

Alexandra and David Morrison submit that they have established probable success on the merits, will be irreparably harmed, a preliminary injunction will not substantially harm Portland Public Schools, a preliminary injunction is in the public interest, and there is no adequate remedy at law.

Pursuant to LR 7-1(a), undersigned has conferred with Ms. Jolle Faber Patterson, General Counsel and Board Secretary, for Portland Public Schools regarding whether its policy of using WI-FI should be preliminarily enjoined. The parties made a good faith effort through written and telephone conference to resolve the dispute and have been unable to do so. Abrell Dec. ¶ 6.

Pursuant to FPRC 65(c), as there is no cost to Portland Public Schools to turn off its WI-FI and as the remedy is strongly in the public interest, Alexandra and Helen Morrison request that any bond be waived or set at a nominal amount.

For the reasons stated in the accompanying *Memorandum*, Alexandra and David Morrison request the Court grant their preliminary injunction motion and enjoin Portland Public Schools from using WI-FI until a final hearing on the merits.

Dated this 27th day of June, 2011.

/s/ Shawn E. Abrell

SHAWN E. ABRELL, WSBA No. 41054
Lead Counsel for Plaintiffs
**Pro Hac Vice*

/s/ Tyl W. Bakker

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