

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE  
DISTRICT OF PENNSYLVANIA**

<b>MUMIA ABU-JAMAL, BRET</b>	:	
<b>GROTE, AND ROBERT BOYLE</b>	:	
<b>Plaintiffs,</b>	:	<b>Case No.</b>
	:	
<b>v.</b>	:	
	:	<b>ELECTRONICALLY FILED</b>
<b>JOHN KERESTES, Superintendent</b>	:	
<b>State Correctional Institution Mahanoy</b>	:	
	:	
<b>GEISINGER MEDICAL CENTER</b>	:	
	:	
<b>Defendants.</b>	:	

**MOTION FOR PRELIMINARY INJUNCTION AND TEMPORARY  
RESTRAINING ORDER**

Plaintiffs hereby move, pursuant to Fed. R. Civ. P. 65, for entry of a Preliminary Injunction and Temporary Restraining Order directing defendants to permit plaintiff Abu-Jamal to visit with attorney plaintiffs Grote and Boyle while he is at Geisinger Medical Center, and to permit plaintiff Abu-Jamal visits with his family while he is at Geisinger Medical Center. This motion is supported by the facts in the verified complaint, declarations accompanying the complaint and this motion, and the memorandum of law in support.

WHEREFORE, Plaintiffs respectfully request that this Court issue a temporary restraining order to prevent ongoing harm to plaintiffs' constitutional rights, and schedule a hearing for the earliest available opportunity and thereafter enjoin defendants from enforcing an absolute prohibition on visitation and communication

with plaintiff Abu-Jamal while he is held at medical facilities located off of  
Department of Corrections property.

Respectfully submitted,

/s/ Bret D. Grote

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NYS ID# 1772094  
Application for *pro hac vice*  
Admission pending

*Counsel for Plaintiffs*

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<b>JOHN KERESTES, Superintendent State Correctional Institution Mahanoy</b>	:	
	:	
<b>GEISINGER MEDICAL CENTER</b>	:	
	:	
<b>Defendants.</b>	:	

**CERTIFICATION**

Pursuant to Local Rule of Civil Procedure 7.1, undersigned counsel for Plaintiffs, Mumia Abu-Jamal, Robert Boyle, and Bret Grote hereby certify that they sought concurrence in the foregoing motion from counsel for all defendants in this action. Counsel for defendants have not given their concurrence.

Dated: May 18, 2015

*/s/ Bret D. Grote*  
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<b>State Correctional Institution Mahanoy</b>	:	
	:	
<b>GEISINGER MEDICAL CENTER</b>	:	
	:	
<b>Defendants.</b>	:	

AND NOW, this 18th day of May, 2015, upon consideration of the foregoing motion, it is hereby ordered that:

1. Defendants are ordered to show cause by May 19, 2015 at \_\_\_\_ [time] why an order granting a preliminary injunction permitting visits between plaintiff Abu-Jamal and his attorneys and family while he is at Geisinger Medical Center should not be issued.

2. Pending the issuance of a preliminary injunction defendants are subject to a temporary restraining order permitting attorney-client visits between plaintiff attorneys and plaintiff Abu-Jamal at Geisinger Medical Center on Monday, May 18 and thereafter;

3. Pending the issuance of a preliminary injunction defendants are ordered to permit plaintiff Abu-Jamal to receive visits from his family while he is at Geisinger Medical Center on Monday, May 18 and thereafter.

BY THE COURT:

\_\_\_\_\_, J.