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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

COLLEEN STROEDER,

Plaintiff,

v.

**SERVICE EMPLOYEES
INTERNATIONAL UNION LOCAL 503,
OREGON PUBLIC EMPLOYEES
UNION; KATE BROWN,** in her official
capacity as governor of Oregon; **PAUL
MATHER,** in his official capacity as acting
director of the Oregon Department of
Transportation; and **KATY COBA,** in her
official capacity as director of the Oregon
Department of Administrative Services,

Defendants.

Case No. 3:19-cv-01181-BR

MOTION FOR PRELIMINARY
INJUNCTION

ORAL ARGUMENT REQUESTED

MOTION FOR PRELIMINARY INJUNCTION

Plaintiff, Colleen Stroeder (“Stroeder”), respectfully moves this Court to enter a preliminary injunction against Defendants Service Employees International Union Local 503, Oregon Public Employees Union (“SEIU”); Kate Brown, in her official capacity as governor of Oregon (“Brown”); Paul Mather, in his official capacity as acting director of the Oregon Department of Transportation (“Mather”); and Katy Coba, in her official capacity as director of the Oregon Department of Administrative Services (“Coba”), as follows:

1. Enjoining Brown, Mather, and Coba from withdrawing union dues from Stroeder’s paycheck;
2. Enjoining SEIU from accepting a transfer of Stroeder’s union dues from Brown, Mather, and Coba;
3. Enjoining Brown, Mather, and Coba from continuing their current pattern and practice of requiring Plaintiff and others similarly situated to wait until a specified time period to stop the deduction of union dues from their paychecks without their affirmative consent.
4. Enjoining Brown, Mather, and Coba from enforcing Oregon Chapter 429, (2019 Laws) (2019 H.B. 2016) Section 6(6) (enacted June 20, 2019, added to and made a part of ORS 243.650 to 243.782, but no ORS section number assigned yet), to the extent that it requires Plaintiff and others similarly situated to wait until a specified time period to stop the deduction of union dues from their paychecks without their affirmative consent.

Dated: August 2, 2019

Respectfully Submitted,

/s/ Brian K. Kelsey
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