

IN THE CHANCERY COURT FOR DAVIDSON COUNTY  
TWENTIETH JUDICIAL DISTRICT  
THE STATE OF TENNESSEE

THE METROPOLITAN GOVERNMENT  
OF NASHVILLE AND DAVIDSON  
COUNTY, et al.,

Plaintiffs,

vs.

TENNESSEE DEPARTMENT OF  
EDUCATION, et al.,

Defendants,

– and –

NATU BAH, et al.,

Intervenor-Defendants.

Case No. 20-0143-II

Chancellor Anne C. Martin, Chief Judge  
Judge Tammy M. Harrington  
Judge Valerie L. Smith

**CONSOLIDATED**

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ROXANNE McEWEN, et al.,

Plaintiffs,

vs.

BILL LEE, in His Official Capacity as  
Governor of the State of Tennessee, et al.,

Defendants,

– and –

NATU BAH, et al.,

Intervenor-Defendants.

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Case No. 20-0242-II

Chancellor Anne C. Martin, Chief Judge  
Judge Tammy M. Harrington  
Judge Valerie L. Smith

PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR A TEMPORARY  
INJUNCTION PURSUANT TO TENN. R. CIV. P. 65.04

Comes now Plaintiffs Roxanne McEwen, David P. Bichell, Terry Jo Bichell, Lisa Mingrone, Claudia Russell, Inez Williams, Heather Kenny, Elise McIntosh, and Apryle Young (collectively, “McEwen Plaintiffs”), pursuant to Rule 65.04 of the Tennessee Rules of Civil Procedure, and moves the Court for a temporary injunction restraining Defendants Governor Bill Lee, Lillian Hartgrove, Robert Eby, Nick Darnell, Mike Edwards, Gordon Ferguson, Elissa Kim, Nate Morrow, Larry Jensen, Darrell Cobbins, Mike Krause, and the Tennessee Department of Education and Commissioner of Education Penny Schwinn from implementing or enforcing the Voucher Law, T.C.A. §49-62601, *et seq.*, and/or using state resources to process applications, engage with parents and schools, or remit any funds in support of the program.

In support of this motion, Plaintiffs rely upon the Complaint filed in this case, Plaintiffs’ Memorandum of Law in support of this motion, the Declaration of Christopher M. Wood in Support of Plaintiffs’ Motion for a Temporary Injunction Pursuant to Tenn. R. Civ. P. 65.04, and any such further briefing, argument, and evidence as may be submitted in this matter.

This is Plaintiffs’ second application for extraordinary relief.

DATED: July 22, 2022

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## CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been forwarded via electronic filing service and electronic mail to the following on this 22nd day of July, 2022:

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