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UNITED STATES DISTRICT
COURT DISTRICT OF
OREGON PORTLAND
DIVISION

ALLISON ROBERTS,

Plaintiff,

v.

PORTLAND PUBLIC SCHOOLS;
CHANDRA WILSON-COOPER;
and DEANNE FROEHLICH

Defendants.

Case No. 3:26-cv-01680-SB

**ALLISON ROBERTS'S
MOTION FOR
PRELIMINARY
INJUNCTION**

**Request for Oral
Argument & Expedited
Hearing**

[28 U.S.C. § 1657(a)]

Under Federal Rule of Civil Procedure 65, Plaintiff Allison Roberts respectfully moves this Court for a preliminary injunction ordering Defendants to:

- Immediately cease enforcement of the District’s Harassment Policy and Nondisclosure Policy against Allison Roberts;
- This includes, as applicable to Allison Roberts’s as-applied claims:
 - Rescinding all previous trespass orders and threatened orders barring Allison Roberts from District property and adjacent public sidewalks;
 - Ceasing the release of public statements to the District community denigrating Allison Roberts’s character;
 - Ceasing all official or unofficial investigations of Allison Roberts;
 - Providing Allison Roberts notice of, and an opportunity to opt her children out from, LGTBQ+ curricula that contradicts her religious or personal beliefs;
 - Providing Allison Roberts immediate notice of her children’s potential attempts to “socially transition” genders at school;

- Immediately cease enforcement of the District’s Harassment Policy and Nondisclosure Policy against all other affected parents within the District’s jurisdiction;
- This includes, as applicable to Allison Roberts’s facial claims:
 - Refraining from enforcement efforts against affected parents based on their protected speech activities;
 - Providing affected parents notice of, and an opportunity to opt their children out from, LGBTQ+ curricula that violate their religious or personal beliefs;
 - Providing them immediate notice of their children’s potential attempts to “socially transition” genders at school.

The grounds for this motion are set forth in Allison Roberts’s Verified Complaint and this motion’s accompanying Memorandum of Law. Allison Roberts also respectfully requests oral argument, and an expedited hearing on this motion under 28 U.S.C. § 1657(a).

Dated: August 24, 2026

Respectfully submitted,

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** Admitted pro hac vice*