

1 Mark W. Bucher  
2 mark@calpolicycenter.org  
3 CA S.B.N. # 210474  
4 Law Office of Mark W. Bucher  
5 18002 Irvine Blvd., Suite 108  
6 Tustin, CA 92780-3321  
7 Phone: 714-313-3706  
8 Fax: 714-573-2297

7 Brian Kelsey (*Pro Hac Vice To Be Filed*)  
8 bkelsey@libertyjusticecenter.org  
9 Jeffrey M. Schwab (*Pro Hac Vice To Be Filed*)  
10 jschwab@libertyjusticecenter.org  
11 Senior Attorneys  
12 Liberty Justice Center  
13 190 South LaSalle Street  
14 Suite 1500  
15 Chicago, Illinois 60603  
16 Phone: 312-263-7668  
17 Fax: 312-263-7702

18 *Attorneys for Plaintiff*

19 **UNITED STATES DISTRICT COURT**  
20 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

21 Thomas Few,

22 Plaintiff.

23 v.

24 United Teachers of Los Angeles, et. al,

25 Defendants.

Case No. 2:18-cv-9531

**PLAINTIFF'S AMENDED MOTION  
FOR PRELIMINARY INJUNCTION**

Hearing Date: Demember 17, 2018

Time: 10:00 am

Judge: Hon. Dean D. Pergerson

26  
27 Plaintiff, Thomas Few, respectfully moves for a preliminary injunction against  
28 Defendants, United Teachers of Los Angeles, Los Angeles Unified School District, and

1 the State of California.

2 Mr. Few respectfully requests that the Court enter a preliminary injunction:

- 3 1. Enjoining United Teachers of Los Angeles from charging Mr. Few union  
4 membership dues;
- 5 2. Enjoining Los Angeles Unified School District from deducting union dues  
6 from Mr. Few's paycheck;
- 7 3. Enjoining the Attorney General from enforcing Cal. Gov't Code §§ 3543.1  
8 and 3546 and Cal. Educ. Code §§ 45060 and 45168 to the extent that they  
9 authorize UTLA and LAUSD to deduct union dues and fees from Mr. Few's  
10 paycheck without his affirmative consent;
- 11 4. Enjoining United Teachers of Los Angeles from acting as Mr. Few's  
12 exclusive representative in his relationship with his employer, Los Angeles  
13 Unified School District; and
- 14 5. Enjoining the Attorney General from enforcing Cal. Gov't Code § 3543 and  
15 all other provisions of California law that provide for exclusive  
16 representation of employees who do not affirmatively consent to union  
17 membership.

18 Dated: November 15, 2018

19 Respectfully submitted,

20 /s/ Mark W. Bucher

21 Mark W. Bucher

22 mark@calpolicycenter.org

23 CA S.B.N. # 210474

24 Law Office of Mark W. Bucher

18002 Irvine Blvd., Suite 108

Tustin, CA 92780-3321

25 Phone: 714-313-3706

26 Fax: 714-573-2297

27 /s/ Brian Kelsey

28 Brian Kelsey (Pro Hac Vice To Be Filed)

bkelsey@libertyjusticecenter.org

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Jeffrey M. Schwab (Pro Hac Vice To Be Filed)  
jschwab@libertyjusticecenter.org  
Senior Attorneys  
Liberty Justice Center  
190 South LaSalle Street  
Suite 1500  
Chicago, Illinois 60603  
Phone: 312-263-7668  
Fax: 312-263-7702

*Attorneys for Plaintiff*