

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BEVERLY SOMAI,

Plaintiff,

vs.

CITY OF BEDFORD,

Defendant.

CASE NO. 1:19-CV-00373

MAGISTRATE JUDGE
KATHLEEN B. BURKE

**STIPULATION AND
PROPOSED ORDER
GRANTING PRELIMINARY
INJUNCTION**

This matter is before the Court on Plaintiffs' June 18, 2019 Motion for Preliminary Injunction [Doc. #: 14]. Defendant City of Bedford, Ohio has agreed to a stipulation, which would grant Plaintiffs the preliminary injunction prayed for in Plaintiffs' Motion. The Parties stipulate as follows:

1. Defendant City of Bedford, Ohio has agreed to suspend enforcement of its Criminal Activity Nuisances Ordinance (Section 511.12 of the Bedford Codified Ordinances), and stipulates to continue its non-enforcement of the Criminal Activity Nuisances Ordinance during the pendency of this litigation. Defendant and all of its officers and agents, including the Bedford Police Department, agree to be enjoined from enforcing Section 511.12 of the Bedford Codified Ordinances until further notice. Non-enforcement under this stipulation requires Defendant to cease sending any nuisance letter to any person including but not limited to Plaintiffs, or taking any action to enforce any past nuisance letter or complaint under the Ordinance.
2. Defendant shall provide notice of this stipulation to the Police Department.

3. This stipulation will remain in full force until further action of the Court.
4. No bond is required.

IT IS SO ORDERED

U.S. DISTRICT JUDGE

Respectfully submitted,

/s/ Elizabeth Bonham

Elizabeth Bonham (0093733)

Joseph Mead (0091903)

Freda J. Levenson (0045916)

American Civil Liberties Union of Ohio Foundation

4506 Chester Avenue

Cleveland, OH 44103



/s/ Sandra S. Park

Sandra S. Park (pro hac vice)

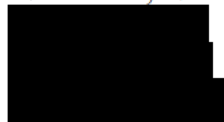
Linda Morris (pro hac vice)

American Civil Liberties Union

Women's Rights Project

125 Broad St. 18th Floor

New York, NY 10004



Counsel for all Plaintiffs

/s/ Sara E. Bird
Sara E. Bird (0096545)
Jennifer E. Sheehe (0084249)
The Legal Aid Society of Cleveland
1223 West Sixth Street
Cleveland, Ohio 44113



Counsel for Plaintiff Beverley Somai

/s/ R. Eric Smearman
R. Eric Smearman (0062132)
Kallen L. Boyer (0093608)
Smith Marshall, LLP
7251 Engle Road, Suite #404
Middleburg Heights, Ohio 44130



Attorneys for Defendant City of Bedford, Ohio

CERTIFICATE OF SERVICE

I certify that on July 22, 2019, I filed this joint stipulation on behalf of all parties using the Court's ECF System, and that copies of this filing will be served on all parties through that system.

/s/ Elizabeth Bonham
Elizabeth Bonham (0093733)