

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION

REV. DWIGHT COKELY *et al.*,

Plaintiffs,

v.

WENDY HONESTY-BEY *et al.*,

Defendants.

CIVIL ACTION NO.
8:25-CV-3363-TDC

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION CONSOLIDATING THE
HEARING WITH THE TRIAL ON THE MERITS**

Pursuant to Rule 65(a)(2), Federal Rules of Civil Procedure, Plaintiffs Reverend Dwight Cokely, Michal Andrew Carlisle, Erica McKinney, Ian Rowe, Mark Shroder, and Leonard Gore, Jr. (collectively "Plaintiffs") move for a preliminary injunction consolidating the hearing with the trial on the merits against Wendy Honesty-Bey, in her official capacity, and Prince George's County, Maryland (collectively "Defendants"). In support, Plaintiffs state:

1. On October 10, 2025, Plaintiffs filed their Complaint for Declaratory and Injunctive Relief alleging, *inter alia* and pursuant to 28 U.S.C. § 1983, that Defendants' application of the 2021 legislative redistricting plan for the Prince George's County Council violates the Fourteenth Amendment to the U.S. Constitution and the Prince George's County Charter § 305.

2. The 2021 legislative redistricting plan, as adopted, is arbitrary and does not reflect an honest and good faith effort to construct districts of nearly equal population as practicable, as required by the Equal Protection Clause or the Prince George's County Charter. Nor do several districts under the plan comport with compactness requirements of the Charter of Prince George's County, Maryland. *See* P.G. CO. CHARTER § 305.

3. For the reasons detailed in the accompanying Memorandum of Law, Plaintiffs seek a preliminary and permanent injunction with the following relief:

- (a) An order consolidating the preliminary injunction hearing with a trial on the merits;
- (b) Declaring the 2021 legislative plan unconstitutional under the Equal Protection Clause of the Fourteenth Amendment to the U.S. Constitution;
- (c) Declaring the 2021 legislative plan unlawful under the Prince George's County Charter § 305;
- (d) Enjoining Defendants from conducting any further elections for Prince George's County Council positions under the 2021 legislative redistricting plan;
- (e) An order requiring Prince George's County to submit proposed remedial plans to present to the Court for approval or modification after notice and an opportunity for hearing; and
- (f) To the extent necessary to effectuate relief on the merits, an order moving the February 26, 2026, candidate qualifying deadline until March 24, 2026.

WHEREFORE, for the foregoing reasons, and those set forth in Plaintiffs' supporting Memorandum of Law, Plaintiffs respectfully request this Court enter a preliminary and permanent injunction enjoining Defendants' and ordering relief as outlined in this motion.

Dated: October 31, 2025

Respectfully submitted,

/s/ Nicholas Taichi Steiner
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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

/s/

Nicholas Taichi Steiner
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Attorney for Plaintiff