

STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

S.B., S.S., T.S., and B.B.

Plaintiffs

vs.

Henry Dargan McMaster, in his official capacity as Governor of the State of South Carolina, and G. Daniel Ellzey, in his official capacity as Director of the South Carolina Department of Employment and Workforce;

Defendants

IN THE COURT OF COMMON PLEAS

FIFTH JUDICIAL CIRCUIT

**PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

**Emergency Hearing Requested**

**TO: ALL DEFENDANTS**

NOTICE IS HEREBY GIVEN THAT Plaintiffs, by and through their undersigned counsel, will move before the presiding judge for a preliminary injunction requiring Defendants to immediately reinstate South Carolina’s participation in the Federal Pandemic Unemployment Compensation (“FPUC”), Pandemic Emergency Unemployment Compensation (“PEUC”), and Pandemic Unemployment Assistance (“PUA”) programs as soon as counsel may be heard. This motion is made upon the grounds stated in Plaintiffs Complaint, the memorandum of law filed concurrently herewith, and such additional evidence, testimony, and argument as may be properly submitted to the court.

The undersigned hereby certifies that, at the time of this filing and to my knowledge, the opposing party is a pro se litigant.

July 28, 2021

SOUTH CAROLINA APPLESEED  
LEGAL JUSTICE CENTER

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