

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

**KIMBERLY BILLUPS, MICHAEL  
WARFIELD, and MICHAEL NOLAN,**

**Plaintiffs,**

**v.**

**CITY OF CHARLESTON, SOUTH  
CAROLINA**

**Defendant.**

Civil Action No. 2:16-cv-00264-DCN

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**PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTIVE RELIEF**

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Plaintiffs Kimberly Billups, Michael Warfield, and Michael Nolan, respectfully move this Court pursuant to Federal Rule of Civil Procedure 65(a), for a preliminary injunction to enjoin Defendant City of Charleston, South Carolina from enforcing its tour-guide-licensing law, Charleston, S.C., Code §§ 29-58 to -63, § 29-66, together with the definitions of “registered tour guide” and “temporary tour guide” contained in § 29-2, during the pendency of this case. This Motion for Preliminary Injunctive Relief is based on the Complaint, the accompanying memorandum of law, and the declaration with exhibits attached thereto.

In accordance with Local Civ. Rule 7.02 (D.S.C.), counsel for Plaintiffs conferred with counsel for Defendant concerning this motion and Defendant opposes the motion.

Dated this 2nd day of February, 2016.

Respectfully submitted,

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Filed Contemporaneously

/s/ Sean A. O'Connor  
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*Local Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 2nd day of February, 2016, a true and correct copy of the foregoing **PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTIVE RELIEF** was sent via overnight mail service to the following Defendants:

Frances I. Cantwell  
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**/s/ Sean A. O'Connor**  
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