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**Pro hac vice*

Attorneys for Plaintiff
Great Northern Resources, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

GREAT NORTHERN RESOURCES, INC.,

Plaintiff,

v.

KATY COBA, in her Official Capacity as
State Chief Operating Officer and Director of
the OREGON DEPARTMENT OF
ADMINISTRATIVE SERVICES; OREGON
DEPARTMENT OF ADMINISTRATIVE
SERVICES; THE CONTINGENT; and DOES
1-10,

Defendants.

Case No.: 3:20-cv-01866-IM

**NOTICE OF MOTION AND MOTION
FOR TEMPORARY RESTRAINING
ORDER OR PRELIMINARY
INJUNCTION**

**EXPEDITED HEARING AND ORAL
ARGUMENT REQUESTED**

TO THE PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiff Great Northern Resources, Inc. (“Great Northern”) will and hereby does move the Court for a temporary restraining order or preliminary injunction.

Great Northern respectfully requests a temporary restraining order or preliminary injunction enjoining Defendants, or any other person or entity acting in concert with them or under the authority of the State of Oregon, from using race as an essential factor in distributing relief funds allocated to the state by the Federal government from the CARES Act’s Coronavirus Relief Fund. Defendants’ operation of the \$62 million Oregon Cares Fund for Black Relief and Resiliency (the “Fund”) violates the Equal Protection Clause, 42 U.S.C. § 1981, and Title VI of the Civil Rights Act of 1964. Immediate relief is necessary, as the Fund is required to distribute all of its discriminatory grants by December 30, 2020.

This motion shall be based on this notice of motion and motion, the memorandum of points and authorities in support, the declarations and evidence filed concurrently herewith, and upon any further matters the Court deems appropriate.

Dated: November 7, 2020

BENBROOK LAW GROUP, PC

By 
BRADLEY A. BENBROOK
Attorneys for Plaintiff
Great Northern Resources, Inc.