

BENBROOK LAW GROUP, PC  
BRADLEY A. BENBROOK\*  
STEPHEN M. DUVERNAY\*  
400 Capitol Mall, Suite 2530  
Sacramento, CA 95814  
Telephone: (916) 447-4900  
Facsimile: (916) 447-4904  
brad@benbrooklawgroup.com  
steve@benbrooklawgroup.com

MURPHY & BUCHAL LLP  
JAMES L. BUCHAL  
3425 SE Yamhill Street, Suite 100  
Portland, OR 97214  
Telephone: (503) 227-1011  
Facsimile (503) 573-1939  
jbuchal@mbllp.com

*\*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.