

KINSEY  
LAW  
OFFICES



## NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

Sample Only  
Use At Your Own Risk



To all parties and their attorneys of record:

PLEASE TAKE NOTICE that on \_\_\_\_\_ [date], at \_\_\_\_\_ [time], or as soon thereafter as the matter can be heard, in \_\_\_\_\_ [Department \_\_ or the law and motion department] of this court, located at \_\_\_\_\_ [address], plaintiffs, \_\_\_\_\_ and \_\_\_\_\_ [names], will and does move the court for an order enjoining defendant, and defendant's agents and employees, from \_\_\_\_\_ [specify acts, such as: entering on plaintiffs' property at \_\_\_\_\_ (address) and damaging anything there or removing anything from it or as the case may be] during the pendency of this action. This motion is made under section 526 of the Code of Civil Procedure on the grounds that: \_\_\_\_\_ [state grounds for issuance of preliminary injunction, such as: (1) Plaintiffs are entitled to the relief demanded to the extent of restraining the commission or the continuance of the acts complained of, specifically, entry onto plaintiffs' property, removal of trees, and damage to vegetation and soil. (2) The commission or continuance of defendant's present course of action will produce great or irreparable injury to plaintiffs, in that the removal of trees from plaintiffs' property will cause permanent damage to the trees and to plaintiff's property. (3) Defendant's entry onto plaintiffs' property and removal of trees in violation of plaintiffs' rights during the pendency of this action will render the final judgment ineffectual. (4) Pecuniary compensation would not afford adequate relief].

The motion will be based on this notice of motion, the attached \_\_\_\_\_ [affidavit or declaration] of \_\_\_\_\_ [name] and memorandum of points and

authorities, the pleadings, documents, records, and files in this action, and such oral and documentary evidence as may be presented at the hearing.

Date: \_\_\_\_\_  
\_\_\_\_\_ [Plaintiff's name]  
Plaintiff *In Pro Per*

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