

**UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT**

**THE NATIONAL POST OFFICE
COLLABORATE, CENTER FOR ART AND
MINDFULNESS, INC., FORMERLY KNOWN AS
THE LOWER FAIRFIELD ART CENTER,
INC., AND KAYSAY H. ABRHA, AN
INDIVIDUAL,**

Plaintiffs

vs.

**PATRICK R. DONAHOE, POSTMASTER
GENERAL OF THE UNITED STATES POSTAL
SERVICE, AND THE UNITED STATES
POSTAL SERVICE,**

Defendants

Case No. _____

**PLAINTIFFS' *EX PARTE* APPLICATION FOR TEMPORARY RESTRAINING
ORDER AND MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65, plaintiffs, The National Post Office Collaborate, Center for Art and Mindfulness, Inc., formerly Known as the Lower Fairfield Art Center, Inc. and Kaysay H. Abrha (collectively referred to herein as the "Plaintiffs) hereby respectfully move this Court for:

A Temporary Restraining Order

(A) (1) Enjoining each of the defendants, Patrick R. Donahoe, Postmaster General of the United States Postal Service, and the United States Postal Service (collectively referred to herein as the "Defendants"), as well as their agents and

employees from, directly or indirectly, from transferring and/or alienating title or Defendants' interest in the Stamford Post Office located at 421 Atlantic Street, Stamford, CT 06904 (the "Stamford Post Office"), and in particular, from proceeding with the sale of the Stamford Post Office scheduled for September 25, 2013, pending a hearing on Plaintiffs' Application for Preliminary Injunction; and (2) an order to show why a preliminary injunction should not issue.

(B) Enjoining each of the Defendants, and their agents and employees from altering or destroying the Stamford Post Office, in any way, pending a hearing on Plaintiffs' Application for Preliminary Injunction; and an order to show why a preliminary injunction should not issue.

A Preliminary Injunction

(A) Enjoining each of the Defendants, as well as their agents and employees from, directly or indirectly, from transferring and/or alienating title or Defendants' interest in the Stamford Post Office and in particular, from proceeding with the sale of the Stamford Post Office scheduled for September 25, 2013.

(B) Enjoining each of the Defendants, and their agents and employees from altering or destroying the Stamford Post Office, in any way.

Plaintiffs rely upon the Complaint, Affidavit of Drew Backstrand verifying the allegations in the Complaint, and the Memorandum of Law submitted herewith in support of this Application.

No notice of this Application was provided to Defendants. Plaintiffs rely upon the Affidavit of Adam Ford, Esq., submitted herewith to explain why no notice was possible, and why no notice was possible, prior to the filing of this Application. The undersigned counsel certifies that irreparable harm to Plaintiffs would likely result if Defendants are allowed to transfer and/or alienate title to the Stamford Post Office, or alter or damage the Stamford Post Office, in any way, before entry of an order granting the injunctive relief sought herein.

Dated at Bridgeport, CT, this 25th day of September, 2013.

**PLAINTIFFS,
THE NATIONAL POST OFFICE COLLABORATE,
CENTER FOR ART AND MINDFULNESS, INC.,
FORMERLY KNOWN AS THE LOWER FAIRFIELD
ART CENTER, INC., AND KAYSAY H. ABRHA**

/s/Lawrence S.Grossman

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