

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT DEPARTMENT  
OF THE TRIAL COURT

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SHANNON O’BRIEN, Chair of the  
Massachusetts Cannabis Control  
Commission,  
  
Plaintiff,  
  
v.  
  
DEBORAH GOLDBERG, Treasurer  
and Receiver General of the  
Commonwealth of  
Massachusetts  
(in her official capacity),  
  
Defendant.

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Civil Action No. 2384CV02183

**CHAIR SHANNON O’BRIEN’S (i) MOTION FOR A PRELIMINARY INJUNCTION  
AND (ii) REQUEST FOR A SHORT ORDER OF NOTICE AND BRIEFING SCHEDULE**

Plaintiff Shannon O’Brien (“Chair O’Brien”) respectfully moves the Court to issue a preliminary injunction order prohibiting Defendant Deborah Goldberg, Treasurer and Receiver of the Commonwealth of Massachusetts (“Treasurer Goldberg”) from holding a hearing regarding removal or removing Chair O’Brien from her position at the Cannabis Control Commission unless Treasurer Goldberg complies with procedures to be outlined by the Court.

. Chair O’Brien further requests that the Court issue a short order of notice setting a hearing on her preliminary injunction for December 4, 2023 at 10:00 am.

For the reasons set forth in the accompanying Memorandum of Law, Chair Shannon O’Brien requests that the Court grant the relief requested herein.

Respectfully submitted,  
SHANNON O'BRIEN  
By her attorneys,



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Dated: December 1, 2023

**CERTIFICATE OF SERVICE**

I, William E. Gildea, hereby certify that on December 1, 2023, I caused the foregoing document to be served via email on Defendant's counsel:

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William E. Gildea