

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION**

DO NO HARM,

Plaintiff,

v.

KENYA L. EDDINGS, in her official capacity
as Arkansas Minority Health Commission
Executive Director,

Defendant.

Case No. 4:23-cv-347-LPR

ORAL HEARING REQUESTED

**PLAINTIFF DO NO HARM'S MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Plaintiff Do No Harm, on behalf of its members, respectfully requests that the Court issue a temporary restraining order and a preliminary injunction against Defendant Kenya L. Eddings. Defendant is the Director of the Arkansas Minority Health Commission and, in that capacity, is responsible for selecting applicants for the scholarship. *See* Comp. ¶¶7, 14; Ex. A at 2; Ex. B, at 2; Ex. D at 4; Ex. E at 4. Defendant is directing a race-segregated scholarship (the Minority Healthcare Workforce Diversity Scholarship) that categorically excludes white applicants, Comp. ¶¶14-16; Ex. A at 2; Ex. B, at 2-3, in violation of the Equal Protection Clause, U.S. Const. amend. XIV, §1; 42 U.S.C. §1983. Do No Harm has at least one member who is able and ready to apply to the scholarship for the Fall 2023 semester and future semesters if Defendant stops discriminating.

As explained in Do No Harm's separately filed memorandum in support of this motion and attached exhibits, Do No Harm expects that the application deadline for the Fall 2023 semester will be sometime in June 2023. Accordingly, Do No Harm respectfully requests that this Court issue a temporary restraining order and preliminary injunction barring Defendant from making any scholar-

ship selections for Fall 2023 and subsequent semesters by using the existing, racially exclusionary criteria during the pendency of this action. Because the application process for the next round of scholarships likely ends in June 2023, Do No Harm respectfully asks this Court to grant its motion for temporary restraining order **as soon as possible**, and to rule on the motion for preliminary injunction by **May 31, 2023**.

Finally, the Court should waive the bond requirement under Federal Rule of Civil Procedure 65(c).

Dated: April 26, 2023

Respectfully submitted,



Cameron T. Norris* (TN Mem. # 33467)
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*Application for admission pending

CERTIFICATE OF SERVICE

I filed this motion with the Court via ECF. Because Defendant has not yet entered an appearance, I am also serving this motion and the separately filed memorandum in support, exhibits, and declarations by certified mail, returned receipt requested, at Defendant's address below. I am also sending copies of the same by certified mail, return receipt requested, to the Chair of the Arkansas Minority Health Commission and the Attorney General of Arkansas, at the addresses below.

Director Kenya L Eddings
Arkansas Minority Health Commission
5800 W. 10th St.
Suite 805
Little Rock, AR 72204

Chair Sederick Rice
Arkansas Minority Health Commission
5800 W. 10th St.
Suite 805
Little Rock, AR 72204

Attorney General Tim Griffin
Office of the Attorney General
323 Center Street
Suite 200
Little Rock, AR 72201

Dated: April 26, 2023



Cameron T. Norris