



4. Enjoining Defendants from relying on participation in the Management Assessment Center to prevent Mr. Manlove from applying to and being considered for positions for which he is otherwise qualified.

Such relief is warranted for the reasons set forth in the accompanying Memorandum of Law and exhibits filed herewith in support of this Motion. Plaintiff and the proposed class members remain at continual, imminent risk of adverse employment actions—such as demotions, transfers, and terminations—along with other hostile treatment, that would preclude meaningful and effective final relief at the end of the case.

In the alternative, Plaintiff requests that the Court allow for limited discovery and order an evidentiary hearing on this Motion.

Respectfully submitted this 6th day of December 2018.

*s/Kevin Sharp*

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**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on December 6, 2018, a true and correct copy of the foregoing document has been furnished to the following individuals via the Court's ECF System:

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