

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DISABLED IN ACTION OF	:	
PENNSYLVANIA,	:	
	:	
Plaintiffs,	:	
	:	Civil Action No. 03-CV- 1577
v.	:	
	:	
SOUTHEASTERN PENNSYLVANIA	:	
TRANSPORTATION AUTHORITY,	:	
and THE CITY OF PHILADELPHIA	:	
	:	
Defendants	:	
	:	
	:	
	:	

**PLAINTIFFS’ MOTION FOR PARTIAL PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiff Disabled In Action of Pennsylvania, through their counsel, submit this Motion for Partial Preliminary Injunction. Plaintiffs request that the Court enjoin Defendant SEPTA from denying equal access to the newly constructed and altered stairways at the 15<sup>th</sup> and Market Street entrance to the concourse and to order Defendant SEPTA to commence immediately to construct an elevator at the 15<sup>th</sup> and Market Street entrance so that persons with mobility impairments who use wheelchairs will have equal access as nondisabled persons. In support of this Motion, Plaintiffs submit the accompanying Memorandum of Law, which is incorporated by reference in this Motion. Plaintiffs further request an evidentiary hearing on this Motion.

Respectfully submitted,

Dated: January 5, 2004

By: SFG 226

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