

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:15-cv-00281-WJM-KMT

ABBY LANDOW,  
JEFFREY ALAN,  
SUSAN WYMER,  
LAWRENCE BEAL,

individually and on behalf of  
others similarly situated,

GREENPEACE, INC.,  
NANCY YORK,

Plaintiffs,

v.

CITY OF FORT COLLINS,

Defendant.

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**JOINT MOTION FOR ENTRY OF STIPULATED PERMANENT INJUNCTION  
AGAINST DEFENDANT**

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Plaintiffs Abby Landow, Jeffrey Alan, Susan Wymer, Lawrence Beal, Greenpeace, Inc., and Nancy York and Defendant City of Fort Collins hereby stipulate that Defendant, along with Defendant's principals, officers, agents, servants, employees, and representatives, shall be and hereby is PERMANENTLY ENJOINED and restrained from arresting, ticketing, citing, or otherwise interfering with individuals who are solely engaged in passive solicitation. Passive solicitation is defined as passively standing or sitting with a sign or other indication that they are seeking donations, without addressing their solicitation to any specific person, other than in response to an inquiry by that person.

WHEREFORE, the parties respectfully request that the Court issue an Order in the form of the proposed Order attached hereto entering the parties' Stipulated Permanent Injunction Against Defendant.

Dated: April 24, 2015

Respectfully submitted,

/s/ J. Andrew Nathan

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*In cooperation with the ACLU Foundation of  
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**CERTIFICATE OF SERVICE (CM/ECF)**

I hereby certify that on April 24, 2015, I electronically filed the foregoing **JOINT MOTION FOR ENTRY OF STIPULATED PERMANENT INJUNCTION AGAINST DEFENDANT** with the Clerk of Court using the CM/ECF system, which will send notification of the same via email to the following:

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