

Gerald M. Salcido (11956)
jerry@salcidolaw.com
Jon M Hogelin (14981)
jon@salcidolaw.com
SALCIDO LAW FIRM PLLC
43 W 9000 S Ste B
Sandy UT 84070
801.413.1753 Phone
801.618.1380 Fax

Attorneys for Plaintiff

IN THE FOURTH JUDICIAL DISTRICT COURT – PROVO
UTAH COUNTY, STATE OF UTAH

UTAH SAGE, INC. a Utah corporation dba
HOBBY TRACTORS & EQUIPMENT,
LARKIN TIRES, INC. a Utah corporation,
GARY LARSON, an individual,

Plaintiffs,

v.

PLEASANT GROVE CITY,

Defendant.

MOTION FOR TEMPORARY
RESTRAINING ORDER

Case No.: 180401255

Judge: Roger W. Griffin

COMES NOW Plaintiffs through counsel and hereby requests the following temporary
restraining orders:

1. An order staying enforcement of the Ordinance No. 2018-19, codified as Title 8
Chapter 10 Transportation Utility (cited as sections 8-10-1 through 8-10-7) of the Pleasant Grove
Municipal Code (also known as the Transportation Utility Fee “TUF”), until a final resolution of
this case.

2. An order that Pleasant Grove City place in escrow any and all funds that have been collected under the TUF until a final resolution in this case.

The form of the proposed Temporary Restraining Order is attached hereto as Exhibit A. Plaintiffs' Motion for Temporary Restraining Order is supported by the accompanying Petition for Declaration Judgment, and Memorandum in Support..

DATED this 1st day of August 2018.

SALCIDO LAW FIRM PLLC

/s/ Gerald M. Salcido
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2018, I caused a true and correct copy of the foregoing to be served on the persons stated below in the manners indicated:

MOTION FOR TEMPORARY RESTRAINING ORDER

Defendant

(via email to City Attorney Christine Petersen cpetersen@pgcity.org)

/s/ Gerald M. Salcido