

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ZACHARY R. CHERTOK and ELIOT
JOKELSON,

Plaintiffs,

v.

CITY OF MEDFORD, MEDFORD CITY
COUNCIL, and BREANNA LUNGO-
KOEHN, in their official capacities,

Defendants.

Case No. 1:26-CV-10589-GAO

**CITY OF MEDFORD’S RESPONSE TO
PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION**

NOW COMES Defendant City of Medford, acting by and through its Mayor Breanna Lungo-KoeHN as Chief Executive Officer (“City”), and hereby responds to Plaintiffs’ Zachary R. Chertok and Eliot Jokelson (collectively, “Plaintiffs”) Motion for Preliminary Injunction.

As set forth in the Affidavit of the Mayor, attached hereto as **Exhibit A**, the City had not taken any active steps to implement the Values-Aligned Local Investments Ordinance (“Ordinance”) prior to the filing of this present matter and the City will not take any active steps to implement the Ordinance while the matter is pending. As such, Plaintiffs do not face irreparable harm warranting relief. That said, the City does not oppose the issuance of a preliminary injunction to maintain the status quo in this regard.

[signature page to follows]

DEFENDANT CITY OF MEDFORD BY
AND THROUGH ITS MAYOR,

By its attorneys,*



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Date: April 30, 2026

* Subject to the undersigned counsel's limited appearance for the purposes of this response.

CERTIFICATE OF SERVICE

I, Janelle M. Austin, hereby certify that, on the below date, I caused a copy of the foregoing *Response to Plaintiffs' Motion for Preliminary Injunction* through the ECF filing system to counsel of record.



Date: April 30, 2026

Janelle M. Austin

EXHIBIT A

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AFFIDAVIT OF MAYOR BREANNA LUNGO-KOEHN

I, Breanna Lungo-Koehn, Mayor of the City of Medford, hereby depose and state as follows:

1. I am the Mayor and Chief Executive Officer of the City of Medford, a position I have held since January of 2020.
2. The City has not taken any steps to implement the Values-Aligned Local Investments Ordinance (“Ordinance”) prior to the filing of this present matter, and the City will not take any active steps to implement the Ordinance while the matter is pending.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 28th DAY OF APRIL 2026.



Mayor Breanna Lungo-Koehn