

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ZACHARY R. CHERTOK, et al.,

Plaintiffs,

v.

CITY OF MEDFORD, et al.

Defendants.

C.A. No.: 1:26-cv-10589-GAO

**PROPOSED
INTERVENORS'
MOTION FOR LEAVE
TO FILE OPPOSITION
TO THE CITY OF
MEDFORD'S
STIPULATION AND
PLAINTIFFS' UPDATED
REQUEST FOR FINAL
RELIEF**

Proposed Intervenors respectfully move for leave to file the attached Opposition to the City of Medford's Stipulation and request for entry of final judgment (ECF No. 54), as well as Plaintiffs' updated request for declaratory and permanent injunctive relief (ECF No. 55).

Under Local Rule 7.1(b)(3), papers beyond those otherwise authorized by Local Rule 7.1(b) may be submitted with leave of Court. Proposed Intervenors seek leave to respond to these filings, both submitted after briefing on Proposed Intervenors' pending Motion to Intervene had concluded.

Good cause exists for granting leave. The City's Stipulation requests that the Court enter final judgment granting permanent injunctive relief barring enforcement or implementation of the Ordinance that Proposed Intervenors seek to defend, and Plaintiffs' subsequent filing requests

entry of declaratory and permanent injunctive relief in their favor. These filings therefore bear directly on issues presented by the pending Motion to Intervene, including whether the existing parties adequately represent Proposed Intervenors' interests and whether disposition of this action may impair those interests.

Proposed Intervenors have worked as expeditiously as possible to address both filings and submit their Opposition in advance of the scheduled hearing. Granting leave will permit the Court to consider these material developments without delaying the proceedings or prejudicing any party.

The proposed Opposition is attached hereto as Exhibit A.

WHEREFORE, Proposed Intervenors respectfully request that the Court grant leave to file the attached Opposition to the City of Medford's Stipulation and Plaintiffs' updated request for final relief.

Dated: August 28, 2026

Respectfully submitted,

/s/Micah-Shalom Kesselman

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(a)(2), I certify that prior to filing this Motion, I conferred with counsel of record for all parties. Plaintiffs oppose the Motion, asserting that Proposed Intervenor “have no standing to engage in any motions practice whatsoever” and characterizing the proposed filing as part of an “ongoing effort to clog the docket.” Proposed Intervenor respectfully submit that the proposed Opposition addresses material developments bearing directly on issues central to their pending Motion to Intervene, including adequacy of representation and impairment of their interests. The City has not stated its position.

/s/Malak Afaneh

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CERTIFICATE OF SERVICE

I certify that on August 28, 2026, the foregoing motion and attached Exhibit A were served on all counsel of record through the Court's CM/ECF system.

/s/Malak Afaneh

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