

**IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS**

**GOVERNMENT OF THE VIRGIN
ISLANDS,**

Plaintiff,

v.

**SUGAR BAY CLUB AND RESORT
CORPORATION,**

Defendant.

CASE. NO. ST-16-CV-

**ACTION FOR INJUNCTIVE RELIEF
AND DECLARATORY JUDGMENT**

**MOTION FOR TEMPORARY RESTRAINING ORDER
PRELIMINARY INJUNCTION, AND DECLARATORY RELIEF**

COME NOW, Plaintiff, Government of the Virgin Islands, and the Virgin Islands Attorney General, by and through their undersigned counsel, and hereby move this Court pursuant to Rule 65 of the Federal Rules of Civil Procedure for a Temporary Restraining Order, and Preliminary Injunction restraining and enjoining any and all terminations of employees by Sugar Bay Club and Resort Corporation and any subsidiaries or related entities without first making advance notification as described in Title 24 V.I.C. § 472 to the employees, the employees' respective labor unions, and the Commissioner of the Virgin Islands Department of Labor. The basis for this motion is more fully set forth in the memorandum filed herewith. For the reasons set forth therein, it is respectfully requested that the relief sought be granted.

Respectfully Submitted,
CLAUDE E. WALKER, ESQ.
Attorney General

Dated: 3/11/2016

By: 
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