

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Abingdon Division**

THE CITY OF BRISTOL,)
TENNESSEE,)
)
Plaintiff,)
)
v.)
)
THE CITY OF BRISTOL, VIRGINIA,)
)
Defendant.)

Civil Action No. 1:22-cv-23

**THE CITY OF BRISTOL, TENNESSEE’S
EXPEDITED MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff The City of Bristol, Tennessee (“Bristol, TN”), by counsel, and pursuant to Fed. R. Civ. P. 65, moves for a preliminary injunction against and respectfully requests that the Court enter an Order requiring that Defendant the City of Bristol, Virginia:

1. Install a sidewall odor mitigation system around the perimeter of Defendant’s Bristol Integrated Solid Waste Management Facility located at 2125 Shakesville Road, Bristol, Virginia, 24201(the “Landfill”);
2. Install and monitor a dedicated system of thermocouples in the waste mass to monitor Landfill temperatures;
3. Cease accepting waste at the Landfill;
4. Provide adequate cover of the waste at the Landfill; and
5. Submit a report within sixty days detailing how the other recommendations of the Expert Panel Report: Bristol Integrated Solid Waste Management Facility, Bristol, Virginia, dated April 25, 2022, will be accomplished.

The grounds for Bristol, TN’s motion are set forth in the accompanying Memorandum filed herewith. Bristol, TN further moves this Court for expedited consideration of its Motion.

May 26, 2022

Respectfully submitted,

/s/ Michael E. Lacy

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