

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF FAIRFAX  
Civil Division

FILED  
CIVIL PROCESSING  
2023 DEC 22 A 11:43

JOHN T. FREY  
CLERK, CIRCUIT COURT  
FAIRFAX, VA

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MOUNT PLEASANT BAPTIST CHURCH	)
BOARD OF TRUSTEES et. al.,	)
<i>Plaintiffs,</i>	)
	)
v.	)
	)
DR. KEVIN E. DONALSON	)
<i>Defendant.</i>	)
_____	)

Case No.:CL-2023-0016807

**AMENDED MOTION FOR PRELIMINARY INJUNCTION**

COMES NOW Plaintiffs MOUNT PLEASANT BAPTIST CHURCH BOARD OF TRUSTEES et. al., by counsel, moves for this Court for preliminary injunction against Defendant DR. KEVIN E. DONALSON to:

- 1) Enjoin him from making, approving, or authorizing any expenditure by the Church without approval from the Board of Trustees;
- 2) Enjoin him from taking any further personnel actions;
- 3) Enjoin him from taking any actions to remove Board of Trustees or otherwise elect new Trustees;
- 4) Invalidating any actions taken by Dr. Donalson at the Church's Annual Business Meeting on December 27, 2023, including the appointment of new officers and trustees of the church, unauthorized expenditures, removal of Rev. Pinkney as Director of Operations, etc.

Further reasons for granting this motion are contained in the memorandum filed on November 27, 2023. This matter is currently set to be heard by the Court on January 30, 2023, at 10:00 am .

Dated: December 22, 2023

Respectfully submitted,

MOUNT PLEASANT BAPTIST CHURCH  
BOARD OF TRUSTEES

By Counsel



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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this December 22, 2023, that a copy of the foregoing was served via first class mail on the foregoing:

Kevin E. Donaldson  
4116 Legato Rd  
Fairfax, VA 22033  
*Defendant Pro Se*



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Federico J. Zablah