

Department of Health's comprehensive regulatory scheme concerning infectious diseases; and (4) the mandates violate parents' right to due process and their natural rights under the Massachusetts Constitution because they violate their rights to make healthcare decisions for their children and otherwise direct the care and upbringing of their children.

REQUEST FOR RELIEF

WHEREFORE, CHRM respectfully requests that the Court:

- A. Schedule a hearing as soon as practicable;
- B. Enjoin the enforcement of the Defendants' face mask mandates;
- C. Enjoin the Defendants from extending these mandates for any portion of the 2021-2022 school year and beyond; and
- D. Award such other relief as is just and equitable.

Respectfully submitted,

CHILDREN'S HEALTH RIGHTS OF
MASSACHUSETTS, INC.,

By Its Attorneys,

FOJO LAW, P.L.L.C.

Dated: September 20, 2021

/s/Robert M. Fojo

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