

STATE OF MICHIGAN
CIRCUIT COURT FOR THE 30TH JUDICIAL CIRCUIT
INGHAM COUNTY

DANA NESSEL, ATTORNEY GENERAL OF
THE STATE OF MICHIGAN, ON BEHALF
OF THE PEOPLE OF THE STATE OF
MICHIGAN,

No. 19-474-CE

Plaintiff,

HON. JAMES S. JAMO

v

ENBRIDGE ENERGY, LIMITED
PARTNERSHIP; ENBRIDGE ENERGY
COMPANY, INC.; and ENBRIDGE ENERGY
PARTNERS, L.P.,

Defendants.

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PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

The Plaintiff, Dana Nessel, Attorney General of the State of Michigan, on behalf of the people of the State of Michigan, brings this motion for a preliminary injunction pursuant to MCR 3.310(A).

For the reasons set forth in the brief in support of this motion, the Attorney General respectfully requests that the Court:

A. Enter a preliminary injunction requiring the Defendants to perform the following actions:

1. Immediately provide the State of Michigan any and all information in their possession related to the nature, extent, and cause(s) of newly-discovered damage to the Line 5 dual pipelines and their supporting infrastructure in the Straits of Mackinac first reported to the State on June 18, 2020, including without limitation all inspection reports, photographs, unedited video recordings, engineering evaluations, and the basis for Enbridge's conclusion, if any, that it was or is reasonably prudent to re-start either pipeline;

2. Preserve the status quo by ceasing operation of both legs of the dual pipelines until the State of Michigan can conduct a full review of the information with the assistance of independent experts, and Enbridge affirmatively establishes that it is reasonably prudent to resume their operation; and

B. Grant the Attorney General other relief as the Court finds appropriate and just.

Respectfully submitted,

Dana Nessel
Attorney General

/s/Daniel P. Bock

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Dated: June 22, 2020

LF: Enbridge Straits (AG v)/AG #2019-0253664-B-L/POS 2020-06-22