

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DAN ALTSCHULD, et al.,)	
)	
Plaintiffs)	
)	
v.)	Civil Action No.
)	
GINA RAIMONDO, et al.,)	
)	
Defendants.)	
_____)	

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs, by and through counsel and pursuant to Fed. R. Civ. P. 65 and LCvR 65.1.(c), respectfully move this Court for a nationwide preliminary injunction enjoining Defendants, and all other Federal Agencies, from enforcing the requirement under Executive Orders 14042 and 14043 for Federal employees and Federal contractors to reveal their COVID-19 vaccination status and to receive an unlicensed COVID-19 Vaccine (or otherwise face termination as a Federal employee or removal from a Federal Contract during the pendency of the underlying lawsuit). Plaintiffs have attached a Memorandum of Points and Authorities, and a proposed order, in support hereof. Plaintiffs request an expedited oral hearing pursuant to LCvR 65.1.(d), given that the violations outlined in this motion are continuous and ongoing and that Plaintiffs will face disciplinary action for failing to abide by the Executive Orders as early as November 9, 2021.

Wherefore, for the reasons stated in the attached Memorandum, Plaintiffs respectfully pray this Honorable Court grants this motion.

Respectfully submitted,

/s/ Eric S. Montalvo

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Application for Admission Pending

Counsel for Plaintiff

Certificate of Service

I hereby certify that on October 19, 2021, I filed the foregoing with the Court's ECF system and via electronic mail to the U.S. Attorney's Office for the District of Columbia.

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