

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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FIX THE COURT,	)	)	
	)	)	
	<i>Plaintiff,</i>	)	
	)	)	
v.	)	)	Case No. 18-2091
	)	)	
U.S. DEPARTMENT OF JUSTICE,	)	)	
	)	)	
	<i>Defendant.</i>	)	
<hr/>		)	

**PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff Fix the Court respectfully moves this Court to issue a preliminary injunction enjoining Defendant the U.S. Department of Justice (“DOJ”) from unlawfully impeding Fix the Court’s access to records that must be made available under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”). Fix the Court seeks injunctive relief ordering DOJ to expedite the processing of Fix the Court’s pending FOIA request. Fix the Court’s request seeks records related to Supreme Court nominee Brett Kavanaugh’s past public service in the White House. Such records will allow Fix the Court to inform the public’s participation in the debate regarding Judge Kavanaugh’s nomination to the U.S. Supreme Court. Fix the Court further seeks an injunction ordering DOJ to search for and produce all documents responsive to Fix the Court’s FOIA request by such date as the Court deems appropriate.

The grounds for this motion are set forth in the accompanying Memorandum in Support of Plaintiff’s Motion for a Preliminary Injunction. Pursuant to Local Rule 65.1(d), Fix the Court asks that the Court schedule a hearing on this motion at the Court’s earliest convenience.

Dated: September 6, 2018

Respectfully submitted,

/s/ Elizabeth France

Elizabeth France

D.C. Bar No. 999851

/s/ Austin R. Evers

Austin R. Evers

D.C. Bar No. 1006999

/s/ Hart W. Wood

Hart W. Wood

(D.D.C. Bar application pending)

D.C. Bar No. 1034361

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*Counsel for Plaintiff Fix the Court*

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FOR THE DISTRICT OF COLUMBIA**

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FIX THE COURT,	)	
	)	
	)	<i>Plaintiff,</i>
	)	
v.	)	Case No. 18-2091
	)	
U.S. DEPARTMENT OF JUSTICE,	)	
	)	
	)	<i>Defendant.</i>
_____	)	

**PROPOSED ORDER**

Upon consideration of Plaintiff’s Motion for a Preliminary Injunction, Defendant’s Response thereto, and the entire record, it is hereby

**ORDERED** that Plaintiff’s Motion for a Preliminary Injunction is **GRANTED**; and it is further

**ORDERED** that Defendant the U.S. Department of Justice shall process Plaintiff’s FOIA request dated July 24, 2018; and it is further

**ORDERED** that Defendant the U.S. Department of Justice shall produce all records responsive to Plaintiff’s FOIA request dated July 24, 2018, within \_\_\_ days of the date of this order; and it is further

**SO ORDERED.**

Date: \_\_\_\_\_

\_\_\_\_\_  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on September 6, 2018, I caused a copy of the foregoing Motion for a Preliminary Injunction to be hand-delivered to defendant at the following address:

U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington, DC 20530

In addition, a courtesy copy has been delivered to:

Jessie K. Liu  
U.S. Attorney for the District of Columbia  
555 4th Street NW  
Washington, DC 20530

Dated: September 6, 2018

Respectfully submitted,

/s/ Elizabeth France  
Elizabeth France  
D.C. Bar No. 999851  
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*Counsel for Plaintiff Fix the Court*