

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

HASTINGS AUTOMOTIVE, INC., a
Minnesota corporation, HASTINGS
CHRYSLER CENTER, INC., a Minnesota
corporation; and DOUGLAS W.
ERICKSON, a Minnesota resident,

Plaintiffs,

vs.

KATHLEEN SEBELIUS, in her official
capacity as Secretary of the United States
Department of Health and Human Service;
UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES;
THOMAS PEREZ, in his official capacity
as Secretary of the United States
Department of Labor; UNITED STATES
DEPARTMENT OF LABOR; JACOB
LEW, in his official capacity as Secretary of
the United States Department of the
Treasury; and UNITED STATES
DEPARTMENT OF THE TREASURY,

Defendants.

Case No.: 0:14-cv-00265 PAM-JJG

**PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION
AND STAY**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiffs Douglas W. Erickson, Hastings Automotive, Inc., and Hastings Chrysler Center, Inc., by and through their undersigned counsel, move the Court for a preliminary injunction in the form proposed in the accompanying proposed order against the enforcement of 42 U.S.C. § 300gg-13(a)(4) (the "Mandate") and its implementing regulations, published at 76 Fed. Reg. 46621-46626 (August 3, 2011) (interim final rules) and 77 Fed. Reg. 8725-8730 (Feb. 15, 2012) (final rules), against Plaintiffs, and against any health insurance issuer

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