

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

MEDIA RESEARCH CENTER,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 1:14-cv-379 (GBL/IDD)
KATHLEEN SEBELIUS, et al,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION

Plaintiff Media Research Center (“MRC”), pursuant to Rule 65 of the Federal Rules of Civil Procedure, respectfully requests this Court enter a Preliminary Injunction against Defendants that enjoins enforcement of the Contraception Mandate of the Patient Protection and Affordable Care Act that requires MRC to provide, contrary to its sincerely held religious beliefs, coverage in MRC’s employee health benefits plan for contraceptive, abortifacient, and sterilization services. MRC also requests that the bond required by Rule 65 of the Federal Rules of Civil Procedure be set at a sum that the Court deems proper. In support of this Motion, MRC relies on arguments set forth in its Memorandum in Support of Its Motion for A Preliminary Injunction filed simultaneously herewith.

Dated: April 30, 2014

Respectfully Submitted,

Media Research Center

/s/

David A. Warrington (VSB #72293)

W. Michael Holm (VSB #21035)

Laurin H. Mills (VSB #79848)

LeClairRyan, A Professional Corporation

2318 Mill Road, Suite 1100

Alexandria, Virginia 22314

Phone: 703.684.8007

Facsimile: 703.684.8075

david.warrington@leclairryan.com

michael.holm@leclairryan.com

laurin.mills@leclairryan.com

Joseph M. Rainsbury (VSB #45782)

1800 Wells Fargo Tower

Drawer 1200

Roanoke, VA 24006

Phone: 540.510.3000

Facsimile: 540.510.3050

joseph.rainsbury@leclairryan.com

Counsel for Media Research Center

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April, 2014, the foregoing was served via electronic mail and overnight mail (with exhibit binders to follow under separate cover), upon the following:

Michelle Bennett
Trial Attorney
U.S. Department of Justice
Civil Division
Federal Programs Branch
20 Massachusetts Ave. NW
Washington, D.C. 20001
Michelle.Bennett@usdoj.gov

/s/
David A. Warrington (VSB #72293)
LeClairRyan, A Professional Corporation
2318 Mill Road, Suite 1100
Alexandria, Virginia 22314
Phone: 703.684.8007
Facsimile: 703.684.8075
david.warrington@leclairryan.com

Counsel for Media Research Center