

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

)	
MICHIGAN CATHOLIC)	
CONFERENCE, <i>et al.</i> ,)	Case No.: 1:13-cv-01247
)	
<i>Plaintiffs,</i>)	The Honorable Gordon J. Quist
v.)	
)	<i>Electronically Filed</i>
KATHLEEN SEBELIUS, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	

**PLAINTIFFS’ MOTION FOR
PRELIMINARY INJUNCTION AND REQUEST FOR ORAL ARGUMENT**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 7.2, Plaintiffs hereby move for preliminary injunctive relief, without bond, enjoining Defendants from continuing to require Plaintiffs to provide coverage for contraception, abortion-inducing products, sterilization, and related counseling in their employee health plans.

A preliminary injunction is justified, as discussed in Plaintiffs’ accompanying Memorandum of Law in Support of Plaintiffs’ Motion for Preliminary Injunction¹, because (1) Plaintiffs have a strong likelihood of success on the merits of their claims; (2) Plaintiffs are suffering a continuing, irreparable harm in the absence of preliminary relief; (3) an injunction will not cause substantial harm to others, including Defendants; and (4) an injunction furthers the public interest. Accordingly, Plaintiffs respectfully move this Court to issue a preliminary injunction in the form of the Proposed Order attached to this motion.

¹ Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Motion for Preliminary Injunction is to be filed pending the Court’s ruling on Plaintiffs’ Motion to File Excess Pages for Memorandum of Law in Support of Plaintiffs’ Motion for Preliminary Injunction.

Plaintiffs also request oral argument on this motion, which involves important and complicated issues of constitutional and statutory law.

Respectfully submitted, this 20th day of November, 2013.

By: /s/ Matthew A. Kairis

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CERTIFICATE OF SERVICE

I hereby certify that on November 20, 2013, I electronically filed the foregoing Plaintiffs' Motion for Preliminary Injunction and Request for Oral Argument with the Clerk of the United States District Court for the Western District of Michigan using the CM/ECF system and mailed the foregoing by first class mail via the United States Postal Service to the following:

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