

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

Christine Mills et al.,)	
)	
Plaintiffs,)	
)	
v.)	04 CV 2205 (HHK/AK)
)	
James Billington,)	
Librarian of Congress)	
)	
Defendant.)	
_____)	

**MOTION BY PLAINTIFFS FOR AN INJUNCTION TO REQUIRE
DEFENDANT TO COMPILE AND PUBLISH ANNUAL EQUAL
EMPLOYMENT OPPORTUNITY PLANS AND RELATED
REPORTS AND AS REQUIRED BY TITLE VII**

Plaintiffs move for entry of an Injunction that requires the Defendant Library to compile and publish annually Equal Employment Opportunity Plans and related semi-annual progress reports for fiscal years 2005, 2006, 2007, 2008 and 2009 no later than November 30, 2009, or such other date as may be ordered by the Court as modified by an agreement of the parties, and to consult with and solicit recommendations from interested individuals and groups, including Plaintiffs, and equal employment opportunity organizations, and to compile and publish such a Plan each year 2010 and each year thereafter, and to make semi-annual and rated reports for each subsequent fiscal year for 2010 and thereafter.

This motion is based upon Title VII of the Civil rights Act of 1964, as amended, 42 U.S.C. §2000e-16, and upon the record made to date, and upon Exhibits 1 through 9, submitted herewith. A memorandum in support of this motion is submitted herewith and an Injunction of the kind Plaintiffs seek is submitted with this motion.

Based upon the language of Title VII and the other reasons and authorities set forth in their memorandum in support, Plaintiffs request the entry of an Injunction of the kind submitted herewith.

/s/ David L. Rose
David L. Rose
daver@roselawyers.com
Joshua N. Rose
josh@roselawyers.com
Earlene W. Rosenberg
erosenberg@roselawyers.com
Rose & Rose, P. C,
1320 19th St., N. W., Suite 601
Washington, D. C. 20036
Attorneys for the Plaintiffs
Tel. 202 331-8555
Fax 202 331-0996

October 30, 2009