

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

_____	)	
WILLIAM C. LINDSAY, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:13-cv-01210
	)	
SYLVIA M. BURWELL, <i>et al.</i>	)	
	)	
Defendants.	)	
_____	)	

**JOINT MOTION FOR ENTRY OF INJUNCTION AND JUDGMENT**

In light of the Supreme Court’s decision in *Burwell v. Hobby Lobby Stores, Inc.*, 134 S. Ct. 2751 (2014), the parties jointly agree that judgment should be entered in favor of plaintiffs on their Religious Freedom Restoration Act claim, that a permanent injunction should be entered, that all other claims against defendants should be dismissed, and that the deadline for any petition by plaintiffs for attorneys’ fees or costs should be extended to 60 days after judgment is entered. Accordingly, the parties respectfully request that the Court enter the attached Injunction and Judgment, which has been agreed to by all parties. The parties further request that the pending October 20, 2014 deadline for submission of a joint status report be vacated.

Respectfully submitted this 15th day of October, 2014,

*Attorneys for Plaintiffs*

          /s/ Francis J. Manion            
Francis J. Manion  
Geoffrey R. Surtees  
AMERICAN CENTER FOR LAW & JUSTICE  
PO Box 60  
New Hope, KY 40052  
Tel: (502) 549-7020; Fax: (502) 549-5252  
fmanion@aclj.org, gsurtees@aclj.org

Edward L. White III  
AMERICAN CENTER FOR LAW & JUSTICE  
5068 Plymouth Rd.  
Ann Arbor, MI 48105  
Tel: (734) 662-2984; Fax: (734) 302-1758  
ewhite@aclj.org

*Attorneys for Defendants*

JOYCE R. BRANDA  
Acting Assistant Attorney General

ZACHARY T. FARDON  
United States Attorney

JENNIFER RICKETTS  
Director

SHEILA M. LIEBER  
Deputy Director

/s/ Michelle R. Bennett  
MICHELLE R. BENNETT (CO Bar No. 37050)  
Trial Attorney  
United States Department of Justice  
Civil Division, Federal Programs Branch  
20 Massachusetts Avenue N.W. Room 7310  
Washington, D.C. 20530  
Tel: (202) 305-8902  
Fax: (202) 616-8470  
Email: michelle.bennett@usdoj.gov

Attorneys for Defendants.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 15, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notice of such filing to all parties.

/s/ Michelle R. Bennett  
MICHELLE R. BENNETT  
Trial Attorney