

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

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

**PLAINTIFFS’ MOTION FOR
PRELIMINARY INJUNCTION PENDING APPEAL**

Pursuant to Rule 8(a)(1)(C) of the Federal Rules of Appellate Procedure, Plaintiffs respectfully requests that the Court enter an injunction pending appeal. For all the reasons advanced in Plaintiffs’ original Motion for Preliminary Injunction (Doc. 9), Memoranda in Support (Docs. 15 and 26-2), Affidavits (Docs. 11-3, 11-4, 11-5, 27-2, and 27-3), and argument before the Court on December 19, 2013, Plaintiffs request preliminary injunctive relief pending appeal, without bond, enjoining Defendants from continuing to require Plaintiffs to provide coverage for contraceptives, abortion-inducing drugs, sterilization, and related counseling in their employee health plans.

A preliminary injunction is justified, as discussed in Plaintiffs’ accompanying Memorandum in Support, because (1) Plaintiffs are reasonably likely to succeed on the merits of their claims; (2) Plaintiffs are suffering a continuing, irreparable harm in the absence of preliminary relief that outweighs any harm the Government may suffer if the preliminary injunction is granted; (3) Plaintiffs have no adequate remedy at law; and (4) an injunction

further 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.

Respectfully submitted, this 27th day of December, 2013.

By: /s/ Matthew A. Kairis

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CERTIFICATE OF SERVICE

I hereby certify that on December 27, 2013, I electronically filed the foregoing document with the Clerk of the United States District Court for the Western District of Michigan using the CM/ECF system, which will send notification of such filing to the following counsel of record:

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