

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

ROMAN CATHOLIC DIOCESE OF )  
FORT WORTH; UNIVERSITY OF )  
DALLAS; OUR LADY OF VICTORY )  
CATHOLIC SCHOOL; CATHOLIC )  
CHARITIES, DIOCESE OF FORT )  
WORTH, INC., )

*Plaintiffs,*

v.

KATHLEEN SEBELIUS, in her official )  
capacity as Secretary of the U.S. )  
Department of Health and Human )  
Services; THOMAS PEREZ, in his official )  
capacity as Secretary of the U.S. )  
Department of Labor, JACOB J. LEW, in )  
his official capacity as Secretary of the )  
U.S. Department of Treasury; U.S. )  
DEPARTMENT OF HEALTH AND )  
HUMAN SERVICES; U.S. )  
DEPARTMENT OF LABOR; and U.S. )  
DEPARTMENT OF TREASURY, )

**Civil Action No. 4:12-CV-314-Y**

**DEMAND FOR JURY TRIAL**

*Defendants.*

**PLAINTIFF UNIVERSITY OF DALLAS’S MOTION  
FOR PRELIMINARY INJUNCTION**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff University of Dallas respectfully moves this Court for entry of an Order prohibiting Defendants, during the pendency of this litigation, from enforcing the U.S. Government Mandate against the University.

The University needs preliminary injunctive relief because it will be subject to the Mandate beginning on January 1, 2014, when its new plan year begins for its employee group health plan. Accordingly, the University needs a decision on its request for injunctive relief

before January 1, 2014. As set forth more fully in Plaintiffs' Brief in Support of Plaintiff University of Dallas's Motion for Preliminary Injunction and Plaintiffs' Motion for Summary Judgment: (1) the University is substantially likely to succeed on the merits of its claims; (2) the University faces a substantial threat of irreparable injury if the injunction is not issued, (3) the threatened injury if the injunction is denied outweighs any harm that will result if the injunction is granted, and (4) granting the injunction will not disserve the public interest.

Consequently, the University respectfully asks that this Court grant the requested relief and enter an Order prohibiting Defendants, during the pendency of this litigation, from enforcing the U.S. Government Mandate against the University.

Respectfully submitted, this the 9th day of October, 2013.

By: /s/ Basheer Y. Ghorayeb

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**CERTIFICATE OF SERVICE**

I certify that on October 9, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which sent notice of such filing to all parties.

*/s/ Basheer Y. Ghorayeb*  
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