

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

ELECTRONIC PRIVACY INFORMATION CENTER,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF JUSTICE,

Defendant.

Civ. Action No. 19-810 (RBW)

PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1(c), Plaintiff Electronic Privacy Information Center (“EPIC”) respectfully moves the Court to issue a preliminary injunction requiring Defendant U.S. Department of Justice (“DOJ”) to comply with the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, by immediately processing and issuing a determination on EPIC’s FOIA Request for records related to the Special Counsel’s investigation of Russian interference in the 2016 U.S. presidential election. This injunction is necessary to vindicate EPIC’s right to expedited processing of its FOIA Request under 5 U.S.C. § 552(a)(6)(E)(i) and 28 C.F.R. § 16.5(e)(1).

The full grounds for this Motion are set out in the accompanying Memorandum in Support of Plaintiff’s Motion for a Preliminary Injunction. EPIC contacted opposing counsel, who indicated that the DOJ opposes this Motion. Pursuant to Local Rule 65.1(d), and for the reasons set forth the Memorandum, EPIC requests that the Court schedule a hearing on this Motion at the Court’s earliest convenience.

Respectfully Submitted,

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