

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

ELECTRONIC PRIVACY INFORMATION CENTER

Plaintiff,

v.

U.S. NATIONAL ARCHIVES AND RECORDS
ADMINISTRATION,

Defendant.

Civ. Action No. 18-2150

PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, EPIC respectfully moves the Court to issue a preliminary injunction requiring the Defendant U.S. National Archives and Records Administration (“NARA”) to comply with the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”) by immediately searching for and issuing a determination on EPIC’s two FOIA requests concerning records related to Supreme Court nominee Brett M. Kavanaugh and his work at the White House from January 2001 through May 2006. EPIC seeks an order requiring NARA to process EPIC’s requests and issue a determination in advance of the upcoming vote on Judge Kavanaugh’s nomination by the Senate Judiciary Committee and the subsequent floor vote in the United States Senate.

The grounds for this motion are set out in the accompanying Memorandum in Support of Plaintiff’s Motion for a Preliminary Injunction. Pursuant to Local Rule 65.1(d), EPIC requests that the Court schedule a hearing on this motion at the earliest convenience.

Respectfully Submitted,

/s/ Marc Rotenberg
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