

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

_____)	
STOP HILLARY PAC and DAN BACKER,)	No. 1:15-cv-01208-GBL-IDD
)	
<i>Plaintiffs,</i>)	
)	
v.)	
)	
FEDERAL ELECTION COMMISSION,)	
)	
<i>Defendant.</i>)	
_____)	

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs Stop Hillary PAC and Dan Backer respectfully move for a preliminary injunction:

1. prohibiting the FEC from commencing, recommending, pursuing, or ordering any adverse administrative, civil, or criminal action against Stop Hillary PAC or Dan Backer based on Stop Hillary PAC's name during the pendency of this lawsuit; and
2. prohibiting the FEC from enforcing 52 U.S.C. § 30102(e)(4), either facially, or as applied to non-connected political committees with names that clearly and unambiguously oppose a candidate.

A memorandum of law, supporting declaration, and proposed order are attached. As the Defendant has not yet entered an appearance and there is no counsel of record with whom to meet and confer.

Dated this 6th day of October, 2015.

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Dan Backer, Esq.
Virginia State Bar # 78256
DB CAPITOL STRATEGIES PLLC
203 South Union Street, Suite 300
Alexandria, VA 22314
Phone: (202) 210-5431
Fax: (202) 478-0750
E-mail: DBacker@DBCapitolStrategies.com

Attorney for Plaintiff Stop Hillary PAC

Respectfully submitted,

/s/ Michael T. Morley
Michael T. Morley
Virginia State Bar #65762
COOLIDGE REAGAN FOUNDATION
1629 K Street, Suite 300
Washington, DC 20006
Phone: (860) 778-3883
Fax: (202) 331-3759
E-mail: michaelmorleyesq@hotmail.com

Attorney for Plaintiff Dan Backer

CERTIFICATE OF SERVICE

I, Dan Backer, hereby certify that on this 6th day of October, 2015, I did cause a true and complete copy of the foregoing Plaintiff Dan Backer's Motion to Certify Constitutional Questions to *En Banc* Court of Appeals, supporting memorandum, proposed order, and notice of hearing to be transmitted via first-class mail, postage prepaid, upon:

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463
Defendant

/s/ Dan Backer
Dan Backer
Virginia State Bar # 78256
*Attorney for Plaintiff Stop Hillary
PAC*