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

CITIZENS FOR RESPONSIBILITY AND	)	
ETHICS IN WASHINGTON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil No. 17-1855 (RCL)
	)	
U.S. DEPARTMENT OFTHE	)	
TREASURY,	)	
	)	
Defendant.	)	
	)	

## PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Fed. R. Civ. P. 65, plaintiff Citizens for Responsibility and Ethics in Washington respectfully moves for entry of a preliminary injunction to enjoin defendant Department of the Treasury's unlawful attempts to impede plaintiff's efforts to expeditiously obtain agency records concerning travel by Treasury Secretary Steven Mnuchin on non-commercial aircraft for government business. Plaintiff seeks an order requiring defendant to expedite the processing of plaintiff's Freedom of Information Act request, and to disclose all non-exempt responsive records within one week of the Court's order.

The grounds for this motion are set forth in the accompanying memorandum of points and authorities. Plaintiff asks the Court, pursuant to LCvR 65.1(d), schedule a hearing on this application for a preliminary injunction at the Court's earliest convenience.

Pursuant to LCvR 7(m), on the morning of October 26, 2017, counsel for the plaintiff attempted to contact counsel for the defendant regarding this motion. Defendant's counsel has not responded, nor has defendant's counsel responded to plaintiff's inquiry, made on October 20, 2017, as to when the Treasury Department would respond to plaintiff's request. *See* Exhibit C to

Memorandum of Points and Authorities in Support of Plaintiff's Motion for a Preliminary Injunction.

Respectfully submitted,

/s/ Anne L. Weismann

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Dated: October 26, 2017 Attorneys for Plaintiff