

## EXHIBIT 4

# Proposed Order Enjoining Defendants



established they have a high probability that their claims will be vindicated and have met other factors required for the issuance of an injunction.

Therefore, their motion is GRANTED and the Defendants are hereby enjoined from enforcing the Mandate against the Plaintiffs and Putative class members.

Specifically Defendants are enjoined from taking any action that would damage the career or promotion opportunities for plaintiffs in accordance with Section 533's specific prohibitions. Defendant shall not “discriminate or take any adverse personnel action against a chaplain [plaintiff or class member], including denial of promotion, schooling, training, or assignment, on the basis of the chaplain’s refusal to comply with” the COVID-19 vaccine mandate or a chaplain’s actions in accordance with his conscience in relation to that Mandate.

Defendants shall ensure no subordinate attempts retaliation against these chaplains for exercising their conscience in accordance with the rights and protections provided by Section 533 and other statutory provisions including RFRA, and the Constitution. This shall include allowing plaintiffs to move when necessary for training, schooling, necessary denominational training or assignments.

It is further Ordered that Defendants shall cease any administrative or disciplinary action related to the chaplains refusal to take

the COVID-19 vaccine and shall take care to see that the Plaintiffs are treated with respect and equally with vaccinated personnel.

It is so ordered this day of \_\_\_\_\_, 2022.

**William F. Jung**  
U.S. District Court Judge