

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ISRAEL ALVARADO, et al.,

Plaintiffs,

v.

LLOYD AUSTIN, III, et al.,

Defendants.

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Case No.: 1:22-cv-00876-AJT-JFA

PLAINTIFFS’ MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs, 31 Military Chaplains from all Armed Services, and 11 additional military chaplains who moved to join (“Prospective Plaintiffs”) on August 13, 2022, *see* ECF 56, move the Court for a Preliminary Injunction to enjoin the Defendants’ constitutional and statutory violations in connection with the Department of Defense’s (“DoD”) COVID-19 “vaccine” mandate (“DoD Mandate”), *see* Ex. 1, as set forth below and in Plaintiffs’ May 18, 2022 complaint (“*Compl.*”). *See* ECF 1.

Plaintiffs respectfully move for injunctive relief, requesting the Court issue the Proposed Order accompanying this Motion enjoining Defendants’ (1) DoD Mandate implementation and the other challenged Defendant actions; (2) further retaliation against Plaintiffs; (3) from taking punitive or administrative action against Plaintiffs pending resolution of this litigation; and (4) to comply with RFRA, § 533, the First Amendment, and statutory and constitutional limits on their authority.

Plaintiffs’ accompanying Memorandum in Support of this Motion shows they meet the criteria for such Relief.

Dated: August 15, 2022

Respectfully Submitted,

/s/ Arthur A. Schulcz, Sr.

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that on this 15th day of August, 2022, the foregoing Plaintiffs' Motion was e-filed using the CM/ECF system.

Respectfully Submitted,

/s/ Arthur A. Schulcz

Arthur A. Schulcz