

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION,  
FEMHEALTH USA, INC., d/b/a CARAFEM,  
MILO WORLDWIDE LLC,  
PEOPLE FOR THE ETHICAL TREATMENT  
OF ANIMALS, INC.,

Plaintiffs,

v.

WASHINGTON METROPOLITAN AREA  
TRANSIT AUTHORITY,  
PAUL J. WIEDEFELD,  
Defendants.

No. 1:17-cv-\_\_\_\_\_

**MOTION FOR A PRELIMINARY INJUNCTION  
BY PLAINTIFF MILO WORLDWIDE LLC**

Pursuant to Fed. R. Civ. P. 65, Plaintiff MILO Worldwide LLC hereby moves for the entry of a preliminary injunction directing the Defendants to re-post, for the remaining 18 days of a 28-day advertising campaign, a set of advertisements for the book *Dangerous* by Milo Yiannopoulos that the Defendants approved, received full payment for, posted in Metro stations and on Metrorail trains, and then precipitously removed after receiving complaints from members of the public.

As more fully set forth in Plaintiffs' Memorandum in Support, Plaintiff MILO Worldwide LLC is likely to succeed on the merits of its claims and will suffer irreparable harm in the absence of preliminary relief. The balance of equities tilts strongly in its favor, and an injunction protecting its constitutional rights is accord with the public interest.

Wherefore a preliminary injunction should issue.

August 8, 2017

Respectfully submitted,

*/s/ Arthur B. Spitzer*

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