

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

EDMUND DI LISCIA, et al.,

Plaintiffs,

v.

LLOYD JAMES AUSTIN III, et al.,

Defendants.

Civil Action No. 1:21-cv-01047-TJK

**APPLICATION FOR PRELIMINARY
INJUNCTION
(Oral Argument Requested)**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1(c), Plaintiff OS2 Mohammed Shoyeb hereby moves for a preliminary injunction preventing Defendants from forcing him to violate his sincere religious beliefs by shaving rather than maintaining the beard required by his Islamic faith. OS2 Shoyeb has requested a religious accommodation from the Navy to allow him to grow his beard in accordance with his faith and has been rejected.

As further elaborated in the accompanying memorandum of points and authorities, the Navy's accommodation denial compels OS2 Shoyeb to violate his sincere religious beliefs and thereby irreparably harms his constitutional and statutory rights. Expedited consideration is therefore appropriate, as the Court already recognized in the case of Plaintiff EMN3 Edmund Di Liscia. Accordingly, Plaintiff OS2 Shoyeb respectfully requests a hearing and a decision on this motion no later than August 20, 2021.

In compliance with Local Civil Rule 7(m), counsel gave notice to counsel for the opposing parties of Plaintiff's request for the requested relief, and counsel for the opposing party did not agree to providing the requested relief.

Respectfully submitted,

/s/ Eric S. Baxter

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