

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

**ROMAN CATHOLIC ARCHBISHOP
OF WASHINGTON**, a corporation sole,

Plaintiff,

v.

MURIEL BOWSER, et al.,

Defendants.

Civil Action No. 20-3625 (TNM)

ELECTRONICALLY FILED

RELIEF REQUESTED BY
DECEMBER 18, 2020

**APPLICATION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(b) and Local Civil Rule 65.1, the Roman Catholic Archbishop of Washington (“Archdiocese”) submits this application for a temporary restraining order and preliminary injunction against restrictions on worship services imposed by the District of Columbia in violation of the Religious Freedom Restoration Act and the Free Exercise Clause of the First Amendment. In particular, the Archdiocese seeks a temporary restraining order and preliminary injunction against the 50-person limit on attendance at indoor worship services set forth in Mayor’s Order 2020-119 issued on November 23, 2020, and against the enforcement of any other discriminatory limit on the number of attendees at worship services. The grounds for this application are set forth in the accompanying Statement of Points and Authorities. The Archdiocese respectfully requests a hearing and that the Court adjudicate this application on an expedited basis and issue relief by December 18, 2020.

A proposed order is attached.

Pursuant to Local Civil Rule 7(m), counsel for the Archdiocese conferred with counsel for the Defendants on December 14, 2020, and they indicated that they oppose this application and would be amenable to submitting a response by 3pm Thursday, December 17.

Respectfully submitted, this the 14th day of December, 2020.

/s/ Anthony J. Dick

Anthony J. Dick (D.C. Bar No. 1015585)
Donald F. McGahn (D.C. Bar No. 449987)
John M. Gore (D.C. Bar No. 502057)
Sherif Girgis (D.C. Bar No. 1048921)
Caroline C. Lindsay
Joseph P. Falvey (D.C. Bar No. 241247)
JONES DAY
51 Louisiana Ave. NW
Washington, DC 20001
Telephone: (202) 879-7679
Facsimile: (202) 626-1700

John D. Goetz
JONES DAY
500 Grant Street, Suite 4500
Pittsburgh, PA 15219
Telephone: (412) 391-3939
Facsimile: (412) 394-7959

Mark L. Rienzi (D.C. Bar No. 494336)
Eric C. Rassbach (D.C. Bar No. 493739)
Adèle A. Keim (D.C. Bar No. 989528)
William J. Haun (D.C. Bar No. 1024405)
THE BECKET FUND FOR RELIGIOUS LIBERTY
1919 Pennsylvania Ave. NW, Suite 400
Washington, DC 20006
Telephone: (202) 955-0095
Facsimile: (202) 955-0090

Counsel for Plaintiff

CERTIFICATE OF COUNSEL PURSUANT TO LOCAL CIVIL RULE 65.1(a)

The undersigned hereby certifies that, simultaneous with this filing, counsel for the Archdiocese gave counsel for the Defendants actual notice of the time of making this application, and that copies of all pleadings and papers filed in this action to date have been furnished to counsel for the Defendants by e-mail.

/s/ Anthony J. Dick
Anthony J. Dick

Counsel for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 14th, 2020, a true and correct copy of the foregoing was electronically filed using the CM/ECF system, which will send notification of such filing to all counsel of record. A true and correct copy of the foregoing was also sent to counsel for Defendants via email.

/s/ Anthony J. Dick
Anthony J. Dick

Counsel for Plaintiff