

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ALABAMA

ETERNAL WORD TELEVISION  
NETWORK, INC.,

*and*

STATE OF ALABAMA,

*Plaintiffs,*

v.

KATHLEEN SEBELIUS, *et al.*,

*Defendants*

No. 1:13-cv-521

**EWTN'S UNOPPOSED RENEWED  
MOTION TO EXPEDITE THE  
CASE AND FOR ORAL  
ARGUMENT**

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Plaintiff EWTN respectfully renews its motion to expedite consideration of its partial motion for summary judgment and its request for oral argument. As of July 1, 2014, EWTN will become subject to penalties of \$12,775,000 per year, be forced to violate its Catholic faith by participating in the government's contraceptive delivery scheme, or be forced to violate its faith by dropping insurance for its employees *and* paying approximately \$700,000 per year in penalties. *See* Dkt. 29-9 at ¶¶ 53-64. This impending deadline is creating significant pressure on EWTN's religious beliefs, its ministry, and its relationship with employees, donors, and audience. *Id.* at ¶¶ 64-65. That pressure has grown recently as EWTN engages in

the extensive and complicated preparations required to provide employee healthcare in the coming year, and it will only increase as the deadline grows nearer. *Id.* at ¶ 65; *Newland v. Sebelius*, 881 F. Supp. 2d 1287, 1294-95 (D. Colo. 2012), *aff'd* 542 F. App'x 706 (10th Cir. 2013) (recognizing the harm caused to the “extensive planning involved in preparing and providing” an employee health benefit plan by Mandate-imposed pressure and uncertainty). The continued pressure, and the uncertainty about the future that it creates, also harms EWTN's efforts to maintain its ministry by recruiting and retaining high-quality employees. *Id.* at ¶¶ 21, 60, 65.

To relieve this pressure, EWTN respectfully requests that this Court grant expedited consideration to this case and schedule oral argument, or a date of disposition, as soon as possible.

EWTN's counsel has conferred with counsel for the Defendants concerning this renewed motion and Defendants continue to consent to expediting the case, and do not object to EWTN's request for oral argument.

Respectfully submitted this 20th day of March, 2014,

/s/ Daniel Blomberg

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### **CERTIFICATE OF SERVICE**

I hereby certify that on March 20, 2014, the foregoing motion and memorandum was served via ECF.

/s/ Daniel Blomberg  
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