

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

<b>LAURA HOLMES</b>	)	
	)	
<b>and</b>	)	
	)	
<b>PAUL JOST,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	<b>No. 1:14-cv-01243-RMC</b>
<b>v.</b>	)	
	)	
<b>FEDERAL ELECTION</b>	)	
<b>COMMISSION,</b>	)	
	)	
<b>Defendant.</b>	)	

---

**MOTION FOR PRELIMINARY INJUNCTION**

---

Plaintiffs Laura Holmes and Paul Jost, by and through undersigned counsel, hereby move this Court for a preliminary injunction prohibiting the Federal Election Commission (“FEC”) from enforcing the bifurcated individual-to-candidate contribution limit codified at 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(6).

As set forth in the accompanying Memorandum of Law in support of this Motion, Plaintiffs are likely to succeed on the merits of their constitutional claims. Plaintiffs will be irreparably harmed if the FEC enforces the bifurcated

contribution limit against them, as that limit places an unconstitutional burden on their First and Fifth Amendment rights, and as the 2014 general election is fast approaching. Further, the public interest and the balance of equities favor the entrance of an injunction. Therefore, Plaintiffs satisfy the requirements for entry of a preliminary injunction.

Pursuant to LCvR 7(m) of this Court, on August 18, 2014, undersigned counsel conferred with counsel for the FEC via telephone. The FEC has indicated that it will oppose this motion.

Respectfully submitted this 20<sup>th</sup> day of August, 2014.

/s/ Allen Dickerson  
Allen Dickerson, DC Bar No. 1003781  
Center for Competitive Politics  
124 S. West Street, Suite 201  
Alexandria, VA 22314  
Phone: 703.894.6800  
Facsimile: 703.894.6811  
adickerson@campaignfreedom.org

*Counsel for Plaintiffs*