

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA  
EASTERN DIVISION**

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<p>BUSINESS LEADERS IN CHRIST,  <i>Plaintiff,</i>  v.  THE UNIVERSITY OF IOWA, <i>et al.</i>,  <i>Defendants.</i></p>	<p>Civil Action No. 17-cv-00080-SMR-SBJ</p> <p><b>PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION</b></p> <p><b>ORAL ARGUMENT REQUESTED</b></p> <p><b>(Expedited Relief by January 24, 2018 Requested.)</b></p>
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Pursuant to Federal Rule of Civil Procedure 65, LR 7, and LR 65, Plaintiff Business Leaders in Christ (BLinC) moves for a preliminary injunction requiring Defendants to reinstate BLinC’s registered group status. In support of this motion, and as further explained in the attached memorandum in support, BLinC states the following:

1. Since Spring 2014, BLinC has been a registered student group at the University of Iowa.
2. BLinC is a religious group established for a religious purpose and led by students who share its faith.
3. For as long as it has been registered at the University, BLinC has welcomed anyone to join as a member, and has required its leaders to share its Christian faith.
4. The Defendants deregistered BLinC on November 16, 2017.
5. The basis for the derecognition was Defendant’s disagreement with BLinC’s religious expression and beliefs, and the selection of its religious leaders.

6. The University's actions violate BLinC's clearly established First Amendment rights to freedom of speech, the free exercise of religion, and the freedom to select its religious leaders without government interference.

7. In the enclosed supporting memorandum, BLinC has shown that it has a likelihood of success on the merits of these claims.

8. Absent injunctive relief, BLinC is suffering ongoing irreparable harm through the suppression of its constitutional freedoms and the denial of its ability to participate equally with other student groups at the University.

9. The harms to BLinC's First Amendment rights outweigh any harms to the Defendants' interests. Nor do the Defendants have a legitimate governmental interest in regulating the speech, religious beliefs, or internal religious leadership selection of a private religious student group.

10. Protecting BLinC's First Amendment rights is in the public interest.

11. Because the Defendants derecognized BLinC, BLinC is unable to participate in the University's upcoming spring recruitment fairs, which will take place on January 24 and 25, 2018, and are crucial to BLinC's continued existence.

12. BLinC requests the Court to enjoin the Defendants and require them to reinstate BLinC's status as a registered student organization before January 24, 2018, so that BLinC can participate in the spring recruitment fairs.

13. BLinC further respectfully requests an emergency hearing at the earliest possible time. There is good cause to hold oral argument because this motion presents important issues of First Amendment rights which require a prompt resolution.

WHEREFORE, BLinC requests that this Court enter the following ORDER:

1. Defendants and their agents, servants, and employees are ORDERED to restore the Plaintiff to its status as a registered student group that it enjoyed prior to the withdrawal of its recognition.
2. Defendants and their agents, servants, and employees are ENJOINED from taking any further action to punish or retaliate against the Plaintiff, or any other similarly situated student religious organization at the University of Iowa, for the exercise of their constitutionally protected rights.
3. This Preliminary Injunction shall take effect immediately and shall remain in effect pending trial in this action or further order of this Court.
4. This Court has exercised its discretion to determine that no bond shall be required.

Respectfully submitted,

/s/ Matt M. Dummermuth

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*\*Admission pro hac vice pending*