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13 UNITED STATES DISTRICT COURT
14 FOR THE DISTRICT OF ALASKA

15 DR. JOHN DAVIS; SARAH)
16 HUNTLEY; CHARLES BECKLEY,)
17 WILLIAM BECK)

Case No.

18 Plaintiffs,

**PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

19 v.

20 TRANSPORTATION SECURITY)
21 ADMINISTRATION)

22 and)

23 DEPARTMENT OF HOMELAND)
24 SECURITY)

25 Defendants.)
26)
27)
28)
29)

30 Pursuant to Fed. R. Civ. P. 65, Plaintiffs Dr. John Davis, Sarah Huntley, Charles
31 Beckley, and William Beck respectfully move for entry of a preliminary injunction to
32 enjoin Defendants Transportation Security Administration and Department of Homeland
33 Security from destroying data contained in the System of Records used to test Secure
34 Flight. Despite Plaintiffs' pending requests and appeals made pursuant to the Privacy Act
35 of 1974 for their records contained within the subject System of Records, Defendants

PRELIMINARY INJUNCTION MOTION

1 have destroyed, and have stated they will continue to destroy, data contained in the
2 System of Records. Having exhausted their administrative remedies, Plaintiffs now bring
3 in this Court a complaint for declaratory and injunctive relief for the release of their
4 records. This accompanying motion for a preliminary injunction asks for the cessation of
5 Defendants' destruction of the data pending these proceedings.

6 The grounds for this motion are set forth in the accompanying memorandum of
7 points and authorities. Plaintiffs ask that the Court schedule a hearing on this application
8 for a preliminary injunction at the Court's earliest convenience.

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10 Respectfully submitted,

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