

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

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REPUBLICAN NATIONAL COMMITTEE)	
310 First Street, SE)	
Washington, DC 20003)	
)	
	Plaintiff,)	
)	
v.)	Civil Case No. _____
)	
INTERNAL REVENUE SERVICE)	
1111 Constitution Avenue NW)	
Washington, DC 20224,)	
)	
	Defendant.)	
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PLAINTIFF’S MOTION FOR A PRELIMINARY AND PERMANENT INJUNCTION

Plaintiff Republican National Committee (“Plaintiff”) moves for a preliminary and permanent injunction against Defendant Internal Revenue Service to enjoin it from withholding records sought under the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. Roughly ten months have elapsed since Plaintiff requested records from Defendant under FOIA, and over eight months have elapsed since the extended statutory deadline for responding to Plaintiff’s request and providing or denying records. No records have been released and Defendant has provided no firm date as to when records will be released. Plaintiff seeks entry of an order requiring disclosure of the requested records within ten (10) business days from the Court’s granting of this motion. A memorandum, declaration with exhibits, and proposed order accompany this motion.

Dated: April 15, 2014.

Respectfully submitted,

By: /s/Jason Torchinsky

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2014, copies of the foregoing Plaintiff's Motion for a Preliminary and Permanent Injunction were served by certified mail on the following parties:

Internal Revenue Service
1111 Constitution Avenue NW
Washington, DC 20224

And

Attorney General Eric H. Holder, Jr.
U.S. Department of Justice
950 Pennsylvania Ave. NW
Washington, DC 20530

And

Ronald C. Machen, Jr.
U.S. Attorney for the District of Columbia
United States Attorney's Office
555 4th Street NW
Washington, DC 20530

/s/ Jason Torchinsky
JASON TORCHINSKY