UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL NO:
	)	JUDGE
RUTHERFORD COUNTY, TENNESSEE,	)	
	)	**ORAL ARGUMENT**
Defendant.	)	**REQUESTED**

UNITED STATES' MOTION FOR ENTRY OF TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Plaintiff United States, pursuant to Fed. R. Civ. P. 65 and 42 U.S.C. § 2000cc-2(f), and for the reasons set forth in the accompanying Memorandum, respectfully moves the Court to issue a temporary restraining order and a preliminary injunction, enjoining Rutherford County, Tennessee, its officers, employees, agents, successors and others acting in concert and participation with it (collectively "Rutherford County") to undertake the following actions, notwithstanding the orders of the Chancery Court of Tennessee Sixteenth Judicial District at Murfreesboro, of June 1, 2012 (*Estes, et al. v. Rutherford County Regional Planning Commission, et al.*, No. 10-cv-1443 (Chancery Court, June 1, 2012)), and June 13, 2012 (*Fisher, et al.* v. *Rutherford County, et al.*, No. 12-cv-853 (Chancery Court, June 13, 2012)):

1. The County shall process the Islamic Center of Murfreesboro's request for a certificate of occupancy for the mosque on Veals Road by performing forthwith a final building inspection; and

2. If the building complies with applicable codes and regulations, the County shall issue, on or before July 19, 2012, the certificate of occupancy for the mosque on Veals Road; if the County determines that the building does not comply with applicable codes and regulations, then the County shall immediately notify the Islamic Center of the specific deficiencies and shall promptly re-inspect the building after the Islamic Center informs the County that it has corrected the deficiencies.

The United States further requests that the Court grant such other relief as it deems just and proper.

Respectfully submitted this 18th day of July, 2012,

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