

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JOHN DOE I, <i>et al.</i> ,  v.  GEORGE W. BUSH, <i>et al.</i> ,	Plaintiffs,   Defendants.	Civil Action No.
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**MOTION FOR PRELIMINARY INJUNCTION  
AND EXPEDITED HEARING**

This motion seeks expedited interim relief by issuance of a preliminary injunction enjoining the President of the United States and the Secretary of Defense from waging war against Iraq by initiating a military invasion, in the absence of a Congressional declaration of war. Each of the Plaintiffs faces imminent harm from the war threatened by the Defendants. The Plaintiff service people have the most to lose – their lives and limbs – in an illegal war. The Plaintiff parents risk the loss or injury of their children in the service when an undeclared war commences. The Plaintiff Congressional Representatives are threatened with losing their constitutional right and authority to be the decision makers, representing their constituencies, as to whether the United States will enter a war with Iraq. The Plaintiffs meet the standards for issuance of a preliminary injunction, as the accompanying memorandum of law demonstrates.

The Plaintiffs request that the Court schedule an expedited hearing on this matter. In the face of massive preparations for war and repeated expressions by the administration of its intention to commence a war against Iraq within “days or weeks,” this Court will only have a real opportunity to consider the requested relief if it schedules

a hearing in the same limited span of time within which the administration threatens to act. If a hearing is delayed, it may be too late, and an invasion may already be in progress.

Respectfully submitted,  
John Doe I, *et al.*,

By their Attorneys,

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February 13, 2003

CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the United States Attorney of record by hand and the Attorney General of the United States by mail on February 13, 2003.