

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

ELECTRONIC PRIVACY INFORMATION CENTER

Plaintiff,

v.

NATIONAL SECURITY COMMISSION ON  
ARTIFICIAL INTELLIGENCE, et al.

Defendants.

Civ. Action No. 19-2906

**PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1(c), Plaintiff Electronic Privacy Information Center (“EPIC”) respectfully moves the Court to issue a preliminary injunction requiring Defendants National Security Commission on Artificial Intelligence (“AI Commission”) and U.S. Department of Defense to comply with the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, by expeditiously processing and issuing determinations on EPIC’s FOIA Requests for records concerning the AI Commission. This injunction is necessary to vindicate EPIC’s right to expedited processing of its FOIA Requests. 5 U.S.C. § 552(a)(6)(E)(i).

The full grounds for this Motion are set out in the accompanying Memorandum in Support of Plaintiff’s Motion for a Preliminary Injunction. Pursuant to Local Rule 65.1(d), and for the reasons set forth in the Memorandum, EPIC requests that the Court schedule a hearing on this Motion at the Court’s earliest convenience.

Respectfully Submitted,

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