

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

**DICK ANTHONY HELLER, et al.** )  
 )  
 Plaintiffs, )  
 )  
 v. ) Civil Action No. 22-cv-1894 DRF  
 )  
**DISTRICT OF COLUMBIA, et al.** )  
 )  
 Defendants. )  
\_\_\_\_\_ )

**APPLICATION FOR PRELIMINARY INJUNCTION**

Plaintiffs move this Court to enter a preliminary injunction, enjoining Defendants from enforcing the provisions of District of Columbia Municipal Regulation 24-2343.1. Submitted concurrently herewith is a Memorandum of Points and Authorities in support of this application and a proposed order. Counsel for Defendants has been asked the Defendants' position on this application and has indicated that the Defendants do not consent to entry of the requested injunction.

Respectfully submitted

**DICK ANTHONY HELLER**

**CHARLES NESBY**

**HELLER FOUNDATION**

By: /s/ George L. Lyon, Jr.  
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*Attorneys for Plaintiffs*

Dated: July 11, 2022

***CERTIFICATE OF SERVICE***

I, George L. Lyon, Jr., a member of the bar of this court, certify that I served the foregoing document on all counsel of record for Defendants through the court's ECF system, this 11<sup>th</sup> day of July, 2022.

/s/ George L. Lyon, Jr., DC Bar 388678