

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

RILEY BENJAMIN, on behalf of himself
and others similarly situated,

Plaintiff,

v.

NICOLE COLBERT, et al.,

Defendants.

No. 23-cv- _____

MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1, Plaintiff Riley Benjamin, a Jewish man in the custody of the D.C. Department of Corrections, respectfully moves for a preliminary injunction on behalf of himself and others similarly situated that prohibits Defendants Nicole Colbert, Jimmie Allen, and Jacqueline Williams from violating Jewish individuals' religious exercise rights by requiring external verification of their faith as a prerequisite to providing kosher meals.

Defendants' policy requiring of external verification of faith denies Jewish people seeking to keep kosher the right to freely exercise their religion, and Mr. Benjamin and the putative class challenge it under the Religious Freedom Restoration Act. Plaintiff and others similarly situated are likely to succeed on the merits of these claims. Denying relief will cause them irreparable harm and granting it will advance the public interest without injuring Defendants. The requested injunction also complies with the requirements of the Prison Litigation Reform Act.

For the reasons explained in the attached memorandum, the motion should be granted.

August 10, 2023

Respectfully submitted,

/s/ Scott Michelman

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