

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Jonathan McGlothian; Tracy McGlothian; The
Mt. Olivet Group, LLC,

Plaintiffs,

vs.

W. Heywood Fralin, in his official capacity as
Chair of the State Council of Higher Education
for Virginia; H. Eugene Lockhart, in his official
capacity as Vice-Chair of the State Council of
Higher Education for Virginia; Henry Light, in
his official capacity as Secretary of the State
Council of Higher Education for Virginia; Ken
Ampy, Rosa Atkins, Marge Connelly, Victoria
D. Harker, Stephen Moret, William Murray,
Carlyle Ramsey, Minnis E. Ridenour, Tom
Slater, and Katharine M. Webb, in their official
capacities as members of the State Council of
Higher Education for Virginia; and Peter Blake,
in his official capacity as Director of the State
Council of Higher Education for Virginia,

Defendants.

**PLAINTIFFS' MOTION FOR A
PRELIMINARY INJUNCTION**

Civil Action No. 3:18-cv-00507-REP

For the reasons stated in the accompanying memorandum in support, Plaintiffs Jonathan McGlothian, Tracy McGlothian, and The Mt. Olivet Group, LLC, respectfully move this Court, under Fed. R. Civ. P. 65(a), for a preliminary injunction enjoining Defendants and their agents from requiring Plaintiffs to obtain SCHEV certification before teaching vocational skills to students solicited from the public during the pendency of this litigation. Plaintiffs also respectfully move this Court, under Fed. R. Civ. P. 65(a), for a preliminary injunction enjoining Defendants and their agents from requiring Plaintiffs to obtain SCHEV certification before

preparing students solicited from the public for certification examinations administered by the Project Management Institute during the pendency of this litigation.

Filed with this motion, in addition to the memorandum in support, are the declarations of Plaintiffs Jonathan McGlothian and Tracy McGlothian and the attached exhibits, an exhibit list, and a proposed order.

DATED this 23rd day of July, 2018.

Respectfully submitted,

/s/ Paul M. Sherman
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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of July 2018, a true and correct copy of the foregoing **PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION** was dispatched to a third party process server for service to the following Defendants:

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