

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

OBAMA FOR AMERICA

Plaintiff,

v.

DEMSTORE.COM and WASHINGTON  
PROMOTIONS & PRINTING, INC.,

Defendants.

Civil Action No. 1:12-cv-00889 EGS

Jury Trial Demanded

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**APPLICATION FOR PRELIMINARY INJUNCTION**

Plaintiff Obama for America (“OFA”), under LCvR 65.1(c) and (d), hereby asks the Court to enter an Order enjoining Defendants Demstore.com and Washington Promotions & Printing, Inc. (“Defendants”) from using or displaying OFA’s trademarks in connection with the sale of campaign merchandise or otherwise. OFA’s Motion is supported by the Statement of Points and Authorities, the Declaration of Jeremy Buxbaum, and the Declaration of Meaghan Burdick, filed concurrently herewith. Under LCvR 65.1(d), OFA requests a hearing on this Application within 21 days. Defendants’ counsel has been provided a copy of the Corrected Complaint in this matter, this Application, the Statement of Points and Authorities in Support thereof, and the supporting declarations and exhibits.

WHEREFORE, OFA respectfully asks this Court to grant OFA’s Application for Preliminary Injunction, enter an Order enjoining Defendants from using OFA’s trademarks in connection with the sale of campaign merchandise or otherwise, and for such other and further relief as this Court deems just.

DATE: June 7, 2012

By: /s/ Barry J. Reingold \_\_\_\_\_

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