

- (b) Deny Plaintiff Bilbro's "Motion for a Temporary Injunction and Temporary Restraining Order" filed in concert with his Complaint;
- (c) Award Defendant LSC its costs associated with defending this action; and
- (d) Order any other such relief as the Court deems just and proper.

Respectfully submitted,

/s/ Stephen Suggs

Stephen Suggs

Federal Bar No. 7525

SOUTH CAROLINA APPLESEED CENTER FOR LAW AND JUSTICE

P.O. Box 7187

Columbia, SC 29202

T: (803) 779-1113

ssuggs@scjustice.org

Kristi L. Graunke

Georgia Bar No. 305653 (*Pro Hac Vice Motion to Be Filed*)

SOUTHERN POVERTY LAW CENTER

1989 College Avenue NE

Atlanta, GA 30317

T: (404) 521-6700

kristi.graunke@splcenter.org

Attorneys for Defendant Lutheran Services Carolinas

CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2016, a copy of this document was served on counsel for all parties by filing this document electronically with the Court's CM/ECF system.

/s/ Stephen Suggs
Stephen Suggs
Counsel for Defendant Lutheran Services Carolinas