

**IN THE SUPERIOR COURT FOR THE DISTRICT OF COLUMBIA
CIVIL DIVISION**

NATIONAL ASSOCIATION OF)	
STATE FARM AGENTS, INC.,)	
)	
Plaintiff,)	C.A. No. 02ca0004089
)	Calendar 7
vs.)	Judge Neal E. Kravitz
)	
STATE FARM MUTUAL)	
AUTOMOBILE INSURANCE)	
COMPANY, et al.,)	
)	
Defendants.)	

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff National Association of State Farm Agents, Inc. (“NASFA”) respectfully moves this Court to enter a preliminary injunction against unlawful restrictions on the right of State Farm Agents to sell insurance imposed by Defendants State Farm Mutual Automobile Insurance Company, State Farm General Insurance Company, State Farm Fire and Casualty Company, and State Farm Life Insurance Company (hereinafter collectively referred to as “State Farm”).

Specifically, NASFA seeks to preserve the rights of its Agent-members pendente lite, by enjoining State Farm from breaching its contractual obligations, requiring State Farm either to allow the Agents to sell new State Farm insurance policies, or, in the alternative, to sell new insurance policies issued by other companies where State Farm does not allow them to sell State Farm policies. If the Agents cannot sell new insurance policies, they will be irreparably harmed, because ultimately they will lose their livelihoods.

In support of this motion, Plaintiff files its Memorandum of Law in Support of Plaintiff’s Motion for Preliminary Injunction and supporting Affidavits and Exhibits thereto. A proposed Order granting Plaintiff’s motion is being filed contemporaneously herewith.

WHEREFORE, Plaintiff respectfully requests this Court grant Plaintiff's Motion for Preliminary Injunction against Defendants.

DATED: January ____, 2003

**NEUBERGER, QUINN, GIELEN,
RUBIN & GIBBER, P.A.**

By: _____
Allan Hillman
27th Floor
One South Street
Baltimore, MD 21202-3282
(410) 332-8550
(410) 332-8594 FAX

-and-

DADY & GARNER, P.A.

By: _____
J. Michael Dady (MN ID#2062X)
W. Michael Garner (MN ID#0274914)
Jennifer L. Gehrig (MN ID#285596)
4000 IDS Center
80 South Eighth Street
Minneapolis, MN 55402-2204
(612) 359-9000
(612) 359-3507 FAX

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ____ day of January 2003, I caused a copy of Plaintiff's Motion for a Preliminary Injunction, the Memorandum of Law in its Support, the proposed Order, the Affidavits and Exhibits in its Support, and the Compendium of Authorities Unavailable on Westlaw to be served By Hand upon Lawrence H. Martin, Esquire, Foley, Hoag

& Eliot, LLP, 1747 Pennsylvania Avenue, N.W., Washington, D.C. 20006, Attorneys for All
Defendants.

Allan P. Hillman