IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

THE REAL TRUTH ABOUT OBAMA, INC.	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 3:08-cv-00483-JRS
	)	
FEDERAL ELECTION COMMISSION,	)	
U.S. DEPARTMENT OF JUSTICE,	)	
	)	
Defendants.	)	

UNITED STATES DEPARTMENT OF JUSTICE'S OPPOSITION
TO PLAINTIFF'S SECOND PRELIMINARY INJUNCTION MOTION

The United States Department of Justice opposes Plaintiff's Second Preliminary Injunction Motion (Doc. No. 53) for the reasons articulated by the Federal Election Commission (FEC) in its opposition brief that is being filed on this same date. Rather than repeat the FEC's arguments, the Department of Justice hereby incorporates the FEC's brief by reference.

Respectfully submitted,

GREGORY G. KATSAS
Assistant Attorney General

CHUCK ROSENBERG
United States Attorney

JAMES J. GILLIGAN
Assistant Director, Civil Division,
Federal Programs Branch

By: /s/

Debra J. Prillaman
VSB No. 15844
Assistant United States Attorney
600 E. Main Street, Suite 1800
Richmond, Virginia, 23219-2430
(804) 819-5400
Fax (804) 819-7417
Debra.prillaman@usdoj.gov

/s/

John R. Griffiths
Admitted *pro hac vice*
Senior Trial Counsel
U.S. Department of Justice
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, D.C. 20044
Telephone: (202) 514-4652
Fax: (202) 616-8460
John.Griffiths@usdoj.gov

Attorneys for Defendant United States Department of Justice

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of September, 2008 I have electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Michael Boos
michael.boos@gte.net

James Bopp , Jr
jboppjr@aol.com

Barry Alan Bostrom
bbostrom@bopplaw.com

Clayton James Callen
ccallen@bopplaw.com

Vivien Clair
vclair@fec.gov

Richard Eugene Coleson
rcoleson@bopplaw.com

Kevin Andrew Deeley
kdeeley@fec.gov

Thomasenia Patricia Duncan
tduncan@fec.gov

John Richard Griffiths
john.griffiths@usdoj.gov

Audra Anne Hale-Maddox
ahale-maddox@fec.gov

J. Gerald Hebert
ghebert@campaignlegalcenter.org

David Brett Kolker
dkolker@fec.gov

Seth Edward Nesin
snesin@fec.gov

Adav Noti
anoti@fec.gov

Claire Naila Rajan
crajan@fec.gov

Harry Jacobs Summers
hsummers@fec.gov

I also certify that on the 5th day of September, 2008 I have mailed a copy of the foregoing pleading by U.S. Mail to the following non-ECF users:

Holly J. Baker
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Richard Briffault
Joseph P. Chamberlain Professor of Legislation
Columbia University School of Law
435 West 116th Street
New York, NY 10027

Daniel R. Ortiz
John Allan Love Professor of Law
University of Virginia School of Law
580 Massie Road
Charlottesville, VA 22903-1738

J. Gerald Hebert
The Campaign Legal Center
1640 Rhode Island Ave., N.W., Suite 650
Washington, D.C. 20036

Donald J. Simon
Sonosky, Chambers, Sachse
Endreson & Perry, LLP
Counsel for Democracy 21
1425 K Street, N.W., Suite 600
Washington, D.C. 20005

/s/

Debra J. Prillaman
VSB No. 15844
Assistant United States Attorney and Counsel
for Defendant U.S. Department of Justice
600 E. Main Street, Suite 1800
Richmond, Virginia, 23219-2430
(804) 819-5400
Fax (804) 819-7417
Debra.prillaman@usdoj.gov