

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
Eastern Division**

JANE DOES 1-14, on their own behalf )  
and on behalf of all others similarly )  
situated, )

Plaintiffs, )

v. )

NORTHSHORE UNIVERSITY )  
HEALTHSYSTEM, )

Defendant. )

Case No. 1:21-cv-05683

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**PLAINTIFFS’ NOTICE OF MOTION AND EMERGENCY MOTION FOR  
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Pursuant to L. Civ. R. 7.1 and Fed. R. Civ. P. 65, Plaintiffs, JANE DOES 1-14, on their own behalf and on behalf of all others similarly situated, by and through counsel, hereby move this Court for a Temporary Restraining Order and Preliminary Injunction, enjoining Defendant, NorthShore University Health System, from further denying Plaintiffs’ meritorious requests for religious exemption and accommodation from NorthShore’s mandatory COVID-19 vaccination policy, in violation of Plaintiffs’ rights under Title VII of the Civil Rights Act, 42 U.S.C. §2000e, the Illinois Health Care Right of Conscience Act, 745 ILCS 70/12, and the Food, Drug, and Cosmetics Act, 21 U.S.C. §360bbb-3.

A memorandum of law in support of this motion is submitted herewith. As detailed in the memorandum, this Court’s intervention is respectfully requested **this week**, on an emergency basis, to prevent irreparable harm befalling Plaintiffs and numerous similarly situated NorthShore employees on **November 1, 2021**.

Respectfully submitted,

/s/ Horatio G. Mihet

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