

**IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MISSOURI
AT HANNIBAL**

**HANNIBAL-LAGRANGE UNIVERSITY,
PLAINTIFF,
VS.
LINDA MCMAHON, ET AL.
DEFENDANTS.**

CASE NO. 2:25-CV-00042-HEA

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Hannibal-LaGrange University (“HLGU”), pursuant to Federal Rule of Civil Procedure 65 and Local Rule 4.01, and for the reasons set for in its concurrently filed Suggestions in Support of Plaintiff’s Motion for Preliminary Injunction, respectfully moves this Court for a preliminary injunction preserving the status quo and preventing irreparable harm while this action is litigated.

More specifically, HLGU respectfully asks the Court to:

a. Enjoin Defendants, their officers, agents, and employees from conditioning any present or future Title IV action (including PPA updates, amendments, renewals, and program approvals) on the Missouri Baptist Convention’s signature, designation, or agreement until final judgment or further order; and;

b. Order Defendants to (i) accept and process HLGU’s pending PPA update within fourteen (14) days; (ii) approve the “Freedom on the Inside” prison-education program without imposing any requirement for a signature by the Missouri Baptist Convention or its designee, and (iii) maintain HLGU’s current Title IV eligibility and fund disbursements until final judgment or further order; and

c. Waive any bond under Rule 65(c), or alternatively set a nominal bond of one dollar, because Defendants are fully protected by existing guarantees, statutes and regulations, which will not be advanced by obtaining an agreement by the Missouri Baptist Convention.

WHEREFORE, Plaintiff Hannibal-LaGrange University prays that the Court grant this Motion and award such other and further relief as the Court deems just and proper.

Given the importance of these issues, ORAL ARGUMENT IS REQUESTED.

Respectfully Submitted,

LAW OFFICES OF JONATHAN R WHITEHEAD
LLC

s/Jonathan R. Whitehead

Mo. Bar 56848

229 S.E. Douglas St., Ste. 210

Lee's Summit, Mo 64063

816.398.8305 – Phone

816.278.9131 – Fax

jon@whiteheadlawllc.com

ATTORNEY FOR PLAINTIFF HANNIBAL
LAGRANGE UNIVERSITY

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2025, I electronically filed the above with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

Date: July 15, 2025.

s/Jonathan R. Whitehead

AN ATTORNEY FOR PLAINTIFF HANNIBAL
LAGRANGE UNIVERSITY