

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

BRIAN KAREM,

Plaintiff,

v.

JOSEPH R. BIDEN, JR., in his official capacity as
President of the United States; and JENNIFER
PSAKI, in her official capacity as White House Press
Secretary,

Defendants.

Case No. 1:19-cv-2514-JMC

**JOINT STATUS REPORT AND
JOINT REQUEST TO ENTER PERMANENT INJUNCTION**

The parties to the above-captioned action hereby provide this Joint Status Report regarding developments occurring since their prior joint status report in this action as per the Court's June 8, 2021 minute order.

The parties have entered into a written agreement resolving Plaintiff's claims for attorneys' fees. Defendants have processed payment per the agreement.

The parties now hereby jointly request that the Court so-order the permanent injunction attached hereto as Exhibit A and close this case. *See* Joint Status Rpt., at 2, ECF No. 43 (“[T]he parties agree that the Court may convert the Preliminary Injunction Order, which addressed the suspension of Mr. Karem’s White House Hard Pass based on events at the White House on July 11, 2019, into a permanent injunction against the White House Press Secretary in her official capacity.”)

Dated: May 9, 2022

Respectfully submitted

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Counsel for Plaintiff Brian Karem

Exhibit A

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[PROPOSED] ORDER GRANTING PERMANENT INJUNCTION

Pursuant to the terms of the Parties' Joint Stay Motion, Dkt. 37, in which the official-capacity defendants and the Plaintiff "agreed that should Plaintiff prevail on appeal . . . the Court may convert the preliminary injunction into a permanent injunction against the White House Press Secretary in her official capacity," and pursuant to the further agreement of the Parties as represented to the Court on April 8, 2021, Dkt. 43, and good cause appearing thereon and in the record, it is hereby **ORDERED** that:

- (a) The preliminary and final decisions to suspend Plaintiff's Hard Pass, conveyed in letters to Plaintiff dated August 2, 2019, and August 16, 2019, filed at Dkt. Nos. 3-4 and 3-10, are hereby declared void and without force or effect;
- (b) The Office of the White House Press Secretary is permanently enjoined from punishing Plaintiff for any reason related to any incident that allegedly occurred at the White House or in the White House Rose Garden on July 11, 2019, including through the suspension or revocation of Plaintiff's White House Hard Pass.

SO ORDERED this ____ day of _____ 2022.

United States District Judge