

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JOHN AND JANE DOES 1-9, et al.,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE,

Defendant.

Civil Action No. 25-0325 (JMC)

FEDERAL BUREAU OF INVESTIGATION
AGENTS ASSOCIATION, et al.,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE, et al.,

Defendants.

Civil Action No. 25-0328 (JMC)

NOTICE OF PROPOSED ORDER

The parties to these consolidated cases hereby provide notice to the Court as follows:

1. Having conferred, the parties consent to entry of the attached proposed order regarding the pending motions for a temporary restraining order in lieu of the adjudication of those motions at this time.

2. As part of the parties' conferral last evening, government counsel notified Plaintiffs' counsel that it had learned that evening that a record that pairs the unique identifiers on the list at issue in this case with the corresponding names of the FBI personnel had been provided to the Department by the FBI. The terms of the parties' proposed order encompass the list at issue

in these consolidated cases as well as any subsequent versions of that list, including any record pairing the unique identifiers on the list to names to reflect recent developments.

3. Accordingly, the parties request that the Court vacate the hearing scheduled for today on Plaintiffs' motions for a temporary restraining order and enter the attached proposed order.

Respectfully submitted,

CENTER FOR EMPLOYMENT JUSTICE

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