

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

NATIONAL TREASURY EMPLOYEES UNION,)
800 K Street N.W., Suite 1000)
Washington, D.C. 20001,)
)

NATIONAL FEDERATION OF)
FEDERAL EMPLOYEES, AFL-CIO,)
1225 New York Avenue N.W., Suite 450)
Washington, D.C. 20005,)
)

INTERNATIONAL ASSOCIATION OF)
MACHINISTS AND AEROSPACE WORKERS,)
AFL-CIO,)
9000 Machinists Place)
Upper Marlboro, MD 20772,)
)

INTERNATIONAL FEDERATION OF)
PROFESSIONAL & TECHNICAL)
ENGINEERS, AFL-CIO,)
513 C Street N.E.)
Washington, D.C. 20002, and)
)

INTERNATIONAL UNION, UNITED)
AUTOMOBILE, AEROSPACE AND)
AGRICULTURAL IMPLEMENT WORKERS)
OF AMERICA,)
8000 East Jefferson Avenue)
Detroit, MI 48214)
)

Plaintiffs,)
)

v.)
)

DONALD J. TRUMP,)
President of the United States)
1600 Pennsylvania Avenue N.W.)
Washington, D.C. 20035,)
)

No. 1:25-cv-00420

MOTION FOR
TEMPORARY
RESTRAINING ORDER
AND PRELIMINARY
INJUNCTION

CHARLES EZELL,)
Acting Director,)
Office of Personnel Management)
1900 E Street N.W.)
Washington, D.C. 20415,)
)
DOUGLAS O'DONNELL,)
Acting Commissioner, Internal Revenue Service)
U.S. Department of Treasury)
1500 Pennsylvania Avenue N.W.)
Washington, D.C. 20220,)
)
DOROTHY FINK, Acting Secretary)
U.S. Department of Health and)
Human Services)
200 Independence Avenue S.W.)
Washington, D.C. 20201,)
)
RUSSELL VOUGHT, Acting Director,)
Consumer Financial Protection Bureau,)
1700 G Street N.W.)
Washington, D.C. 20552)
)
RANDY MOORE, Chief,)
U.S. Forest Service)
U.S. Department of Agriculture)
1400 Independence Avenue S.W.)
Washington, D.C. 20250,)
)
DOUG COLLINS, Secretary),
Department of Veterans Affairs)
810 Vermont Avenue N.W.)
Washington, D.C. 20420,)
)
PETE HEGSETH, Secretary)
Department of Defense)
1000 Defense Pentagon)
Washington, D.C. 20301-1000,)
)
MAKENZIE LYSTRUP, M.D., Director,)
Goddard Space Flight Center)
National Aeronautics and Space Administration)
8800 Greenbelt Road)

Greenbelt, MD 20771, and)
)
 MATTHEW J. MEMOLI, Acting Director,)
 National Institutes of Health)
 9000 Rockville Pike)
 Bethesda, MD 20892)
)
 Defendants.)
)

**PLAINTIFFS’ MOTION FOR A TEMPORARY RESTRAINING ORDER AND
 PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs National Treasury Employees Union (NTEU), National Federation of Federal Employees (NFFE), International Association of Machinists and Aerospace Workers (IAM), International Federation of Professional and Technical Engineers (IFPTE), and the International Union, United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) (collectively, the Unions) submit this motion for a temporary restraining order and preliminary injunctive relief.

The Unions seek emergency relief to protect the workers they represent from the Executive Branch’s active liquidation of the federal government through the mass firings of hundreds of thousands of employees (those who are considered “nonessential” for purposes of a government shutdown and those who are in probationary status) and a pressure campaign on federal workers to quit their jobs through a “deferred resignation program.” The mass firings are underway and are proceeding at a staggering pace, as the President and his administration demand

agencies to implement Executive Order No. 14210, Implementing the President's "Department of Government Efficiency" Workforce Optimization Initiative (Feb. 11, 2025) and his other workforce reduction projects.

The Executive Branch's decimation of the federal civilian workforce through these actions, collectively, conflicts with Congress's constitutional prerogative to create federal agencies, legislate their missions, and fund their work. The Executive Branch's actions thus violate separation of powers principles. The mass firing of employees, in addition, violates Congress's reduction-in-force protocol.

Absent prompt injunctive relief, Plaintiff NTEU will imminently lose as much as half of its dues revenue and around half of the workers that it represents. Its bargaining power and influence with respect to its workers and at agencies where it represents workers will be diminished in a way that cannot be undone. The other union plaintiffs will likewise lose critical revenue and heft at the bargaining table.

For these reasons and those contained in the accompanying memorandum of points and authorities, the Unions thus ask this Court to immediately enjoin Section 3(c) of Executive Order No. 14210, which directs the firing of nonessential federal employees and others; the mass firing of probationary employees that is occurring across federal agencies; and further extension or implementation of the deferred resignation program.

Respectfully submitted,

/s/ Julie M. Wilson

JULIE M. WILSON
General Counsel
D.C. Bar No. 482946

/s/ Paras N. Shah

PARAS N. SHAH
Deputy General Counsel
D.C. Bar No. 983881

/s/ William Li

WILLIAM LI
Associate General Counsel
D.C. Bar No. 1006366

/s/ Allison C. Giles

ALLISON C. GILES
Assistant Counsel
D.C. Bar No. 439705

/s/ Jessica Horne

JESSICA HORNE
Assistant Counsel
D.C. Bar No. 1029732

NATIONAL TREASURY
EMPLOYEES UNION
800 K Street, N.W., Suite 1000
Washington, D.C. 20001
Tel: (202) 572-5500
julie.wilson@nteu.org
william.li@nteu.org
paras.shah@nteu.org
allie.giles@nteu.org
jessica.horne@nteu.org

Attorneys for Plaintiff NTEU

/s/ Yvette M. Piacsek

YVETTE M. PIACSEK

General Counsel

D.C. Bar No. 980302

NATIONAL FEDERATION OF FEDERAL
EMPLOYEES, IAM, AFL-CIO

1225 New York Avenue N.W., Suite 450

Washington, D.C. 20005

Tel: 202-216-4428

ypiacsek@nffe.org

Attorney for Plaintiff NFFE

/s/ Carla M. Siegel

CARLA M. SIEGEL

General Counsel

D.C. Bar No. 449953

INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE
WORKERS, AFL-CIO

9000 Machinists Place

Upper Marlboro, MD 20772

Tel: 301-967-4510

csiegel@iamaw.org

Attorney for Plaintiff IAM

/s/ Teresa Ellis

TERESA ELLIS (admission pending)
General Counsel
D.C. Bar No. 495855

INTERNATIONAL FEDERATION OF
PROFESSIONAL & TECHNICAL
ENGINEERS, AFL-CIO
513 C Street N.E.
Washington, D.C. 20002
Tel: (202) 239-4880
tellis@ifpte.org

Attorney for Plaintiff IFPTE

/s/ Joshua B. Shiffrin

Joshua B. Shiffrin
D.C. Bar No. 501008
Bredhoff & Kaiser P.L.L.C.
805 15th Street N.W.
Suite 1000
Washington D.C. 20005
Tel: (202) 842-2600
jshiffrin@bredhoff.com

February 14, 2025

Attorney for Plaintiff UAW