

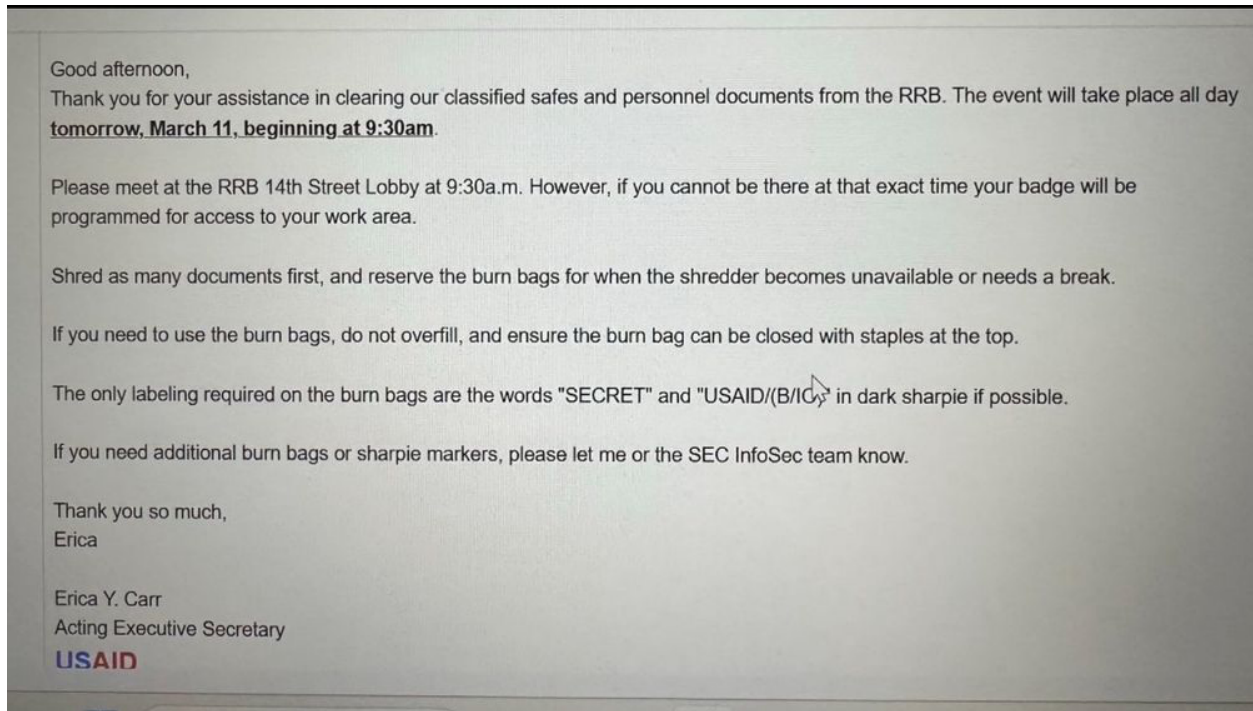
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
PERSONAL SERVICES)	
CONTRACTOR ASSOCIATION,)	
)	
<i>Plaintiff,</i>)	Case No. 1:25-cv-469-CJN
)	
v.)	
)	
DONALD TRUMP, et al.,)	
)	
<i>Defendants.</i>)	
_____)	

**PLAINTIFF’S EMERGENCY MOTION
FOR A TEMPORARY RESTRAINING ORDER TO PRESERVE EVIDENCE**

Plaintiff Personal Services Contractor Association moves the Court to enter an immediate TRO and convene a status, telephonically or in person, stating as follows:

1. Circulating on social media today is a post that is a copy of an email from Erica Carr, the executive secretary of USAID, instructing remaining USAID staff members to shred and burn classified and personnel documents, beginning today, March 11, 2025 at 9:30 a.m.:



2. The email says “Shred as many documents first, and reserve the burn bags for when the shredder becomes unavailable or needs a break.” See also <https://www.devex.com/news/scoop-usaid-staff-instructed-to-shred-and-burn-classified-documents-109621>.

3. On learning this information, Plaintiff’s counsel quickly sent an email to Defendants’ counsel at DOJ, Michael Clendenen, demanding to know, ASAP, whether the post is accurate and, if so, how and why burning and shredding is consistent with preservation obligations in litigation, which documents are being destroyed and why, who authorized it and what DOJ is doing to stop it. That was two and a half hours ago. The questions have not been answered. The only response has been “we’re looking into this.”

4. Plaintiff is concerned that evidence might be being spoliated. DOJ has not confirmed or denied or explained what Defendants are doing.

WHEREFORE, plaintiff ask the Court to:

1. Enter an immediate TRO ordering Defendants to preserve all documents with any possible relevance to pending litigation.
2. Convene a status at the Court's earliest possible convenience requiring DOJ to admit or deny that documents are being destroyed and explain the Carr email and activities related to the destruction of documents at the former USAID headquarters.

Dated: March 11, 2025

Respectfully submitted,

/s/ Marni Willenson

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