

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL ENDOWMENT FOR	:	
DEMOCRACY,	:	
	:	
<i>Plaintiff,</i>	:	No. 1:25-cv-00648
	:	
v.	:	
	:	
UNITED STATES, et al.,	:	
	:	
<i>Defendants.</i>	:	

PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiff National Endowment for Democracy (“the Endowment”) respectfully moves pursuant to Federal Rule of Civil Procedure 65 for a temporary restraining order. For the reasons presented in the memorandum in support of this motion, the Court should enter an order that would stop Defendants and those they supervise from impounding or otherwise interfering with the Endowment’s congressionally mandated funding. The precise contours of the order the Endowment seeks are provided in the proposed order attached to this motion.

Pursuant to Local Rule 65.1(a), counsel for Plaintiffs emailed the Director for the Federal Programs Branch of the Department of Justice, the Chief of the Civil Division of the U.S. Attorney’s Office in Washington, D.C., and the civil process clerk of that office on March 6, 2025, shortly before filing this motion, to provide them with electronic copies of this complaint, this motion for a temporary restraining order, the accompanying memorandum, the unsealed declarations supporting the motion and associated exhibits, and the proposed order. Defendants will separately be served in hard copy, pursuant to this Court’s local rules, with the motion to seal and sealed declarations.

Dated: March 6, 2025

Respectfully submitted,

/s/ Donald B. Verrilli, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2025, I filed the foregoing document with the Clerk of Court for the United States District Court for the District of Columbia using the court's CM/ECF filing.

I further certify that a copy of the foregoing will be deposited with the United States Postal Service, for delivery to the below Defendants and to the Department of Justice by Certified Mail:

United States Department of Treasury 1500 Pennsylvania Ave., NW Washington, DC 20220	Scott Bessent Secretary United States Department of the Treasury 1500 Pennsylvania Ave., NW Washington, DC 20220
United States Office of Management and Budget 725 17th Street, NW Washington, DC 20503	Russell Vought Director United States Office of Management and Budget 725 17th Street, NW Washington, DC 20503
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