

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

Centro de Trabajadores Unidos, et al.,

Plaintiffs,

v.

Scott Bessent, in his official capacity as
Secretary of the Treasury, et al.,

Defendants.

Civil Action No. 25-677 (DLF)

PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Local Civil Rule 65.1(a), Plaintiffs hereby move for a temporary restraining order, to remain in effect until such time as the Court can further consider the merits of Plaintiffs' claims, (1) enjoining Defendants Secretary of the Treasury Scott Bessent, the Internal Revenue Service, and acting Commissioner of Internal Revenue Melanie Krause from disclosing tax return information to the U.S. Department of Homeland Security, U.S. Immigration and Customs Enforcement, the President of the United States, or any other component of the federal government or of a state government seeking such information for purposes of the enforcement of immigration laws, and (2) enjoining Defendants to retrieve and safeguard any such information that has already been disclosed for that purpose. Plaintiffs request a hearing on this motion at the Court's earliest convenience to ensure that the Court can consider whether to grant emergency relief before the unlawful dissemination of confidential tax information.

As set forth in more detail in the accompanying memorandum, Defendants have disclosed or are imminently about to disclose tax return information for purposes of immigration enforcement in violation of the confidentiality requirements of the Internal Revenue Code.

Defendants' actions would be unlawful, and Plaintiffs will suffer imminent and irreparable injury should such unlawful disclosure access be permitted.

Pursuant to Local Civil Rule 65.1(a) and this Court's minute orders, Plaintiffs approached the Department of Justice on the day they filed their complaint to confer about Plaintiffs' request for emergency relief. Between March 10, when counsel for Defendants was identified to Plaintiffs, and March 13, Plaintiffs attempted to reach an agreement with Defendants on a consent order that would preserve the status quo until this Court could resolve the merits of Plaintiffs' claims. Those efforts were unsuccessful. Counsel for Defendants have entered appearances in this case and will receive notice of this motion via ECF.

Dated: March 14, 2025

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(Motion for *pro hac vice* forthcoming)
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(Motion for *pro hac vice* forthcoming)
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Respectfully submitted,

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