

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

RFE/RL, INC.,

Plaintiff,

v.

KARI LAKE, in her official capacity as Senior
Advisor to the Acting CEO of the United
States Agency for Global Media;

VICTOR MORALES, in his official capacity as
acting Chief Executive Officer of the United
States Agency for Global Media; and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-799-RCL

**PLAINTIFF'S NOTICE REGARDING DEFENDANTS' CONTINUED FAILURE TO
APPROVE RFE/RL'S FINANCIAL PLAN**

Consistent with RFE/RL's March 28 filing, ECF 18, RFE/RL is writing to provide an update to the Court. *First*, despite RFE/RL's request, USAGM still has not approved RFE/RL's financial plan for April 2025, nor has USAGM indicated when such an approval will occur, or otherwise engaged with RFE/RL on the matter. *Second*, USAGM has not provided responses to the follow-up questions RFE/RL posed on March 28 relating to RFE/RL's financial plan and other matters, despite RFE/RL following up with Defendants' counsel this morning regarding those questions. *See* ECF 18-2 (containing follow-up questions).

Accordingly, for the reasons set forth in ECF 18, RFE/RL respectfully reaffirms its request that the Court enter a further temporary restraining order that allows RFE/RL to continue to operate without being required to "recover" and "promptly refund[] to USAGM" funds that are spent in

April. Specifically, RFE/RL requests that Defendants be enjoined from attempting to “recover” or seek a “refund” of funds that RFE/RL expends to operate in April based on the absence of an approved financial plan, and that Defendants be enjoined from otherwise interfering with or impeding RFE/RL’s operations based on the absence of an approved financial plan.

Further, RFE/RL requests that the Court grant the preliminary injunction. The preliminary injunction remains necessary because, among other reasons, Defendants have refused to commit to disbursing RFE/RL’s congressionally appropriated funds for April 2025, which begins tomorrow.

March 31, 2025

Respectfully submitted,

/s/ Marney L. Cheek

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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 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 system, which will send notification of such filing via e-mail to all counsel of record.

Respectfully submitted,

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