

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

RFE/RL, INC.,

Plaintiff,

v.

KARI LAKE, in her official capacity, *et al.*,

Defendants.

No. 25-cv-00799-RCL

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION
FOR A FURTHER TEMPORARY RESTRAINING ORDER**

The United States Agency for Global Media (“USAGM” or the “Agency”), Kari Lake, in her official capacity as Senior Advisor to the Acting CEO of USAGM, and Victor Morales, in his official capacity as Acting CEO of USAGM (together, the “Defendants” or the “Government”) respectfully submit this opposition to Plaintiff’s motion for a further temporary restraining order, ECF No. 62 (“Plaintiff’s Motion”). Defendants recognize that the Court has previously rejected the Government’s position, *see e.g.* ECF No. 60, but oppose Plaintiff’s Motion on substantially the same grounds explained in Defendants’ Opposition to Plaintiff’s Motion for a Preliminary Injunction, *see* ECF No. 44. Defendants incorporate by reference herein their arguments from their Opposition to Plaintiff’s Motion for a Preliminary Injunction, *see* ECF No. 44, and their opposition to Plaintiff’s prior motion for a further temporary restraining order, *see* ECF No. 57.

Defendants further note that they had previously identified an alternative source of potential funding for Plaintiff, from the EU, that called into question whether Plaintiff could establish it would suffer irreparable harm absent the requested relief. *See* ECF No. 57 at 3–4. In

its May submission, Plaintiff acknowledged that potential source of funding, but indicated that the timing and amount of the funding was uncertain. *See* ECF No. 59 at 3–4. Defendants note that Plaintiff’s current motion is silent on the status of those potential funds. *See* ECF No. 62, *generally*.

For the reasons explained in Defendants’ prior submissions—including because the Court lacks jurisdiction to consider Plaintiff’s claims, because Plaintiff fails to state a cognizable claim under the Administrative Procedure Act, and because Plaintiff cannot show that it will be irreparably harmed absent the requested relief—this Court should deny Plaintiff’s Motion.

Dated: June 26, 2025

Respectfully submitted,

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