

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SHIRA PERLMUTTER,

*Plaintiff,*

v.

TODD BLANCHE *et al.*,

*Defendants.*

Case No. 25-cv-01659-TJK

PLAINTIFF SHIRA PERLMUTTER'S MOTION  
FOR A PRELIMINARY INJUNCTION

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1, Plaintiff Shira Perlmutter, by undersigned counsel, respectfully moves for a preliminary injunction enjoining Defendants from unlawfully attempting to remove Ms. Perlmutter from her position as Register of Copyrights and Director of the U.S. Copyright Office. The precise contours of the order that Plaintiff seeks are provided in the proposed order attached to this Motion. Preliminary relief is necessary due to the exigency of the circumstances created by Defendants' unlawful conduct and the irreparable injuries that the requested preliminary injunction is intended to prevent.

The grounds for this Motion are set forth in the attached memorandum of law and its supporting declaration. A proposed order is attached.

Dated: June 10, 2025

Respectfully submitted,

/s/ Allyson R. Scher

Brian D. Netter (D.C. Bar No. 979362)

Allyson R. Scher (D.C. Bar No. 1616379)

Democracy Forward Foundation

P.O. Box 34553  
Washington, DC 20043  
(202) 448-9090  
bnetter@democracyforward.org  
ascher@democracyforward.org

Donald B. Verrilli, Jr. (D.C. Bar. No. 420434)  
Ginger D. Anders (D.C. Bar. No. 494471)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue, NW, Suite 500E  
Washington, D.C. 20001  
(202) 220-1100  
donald.verrilli@mto.com  
ginger.anders@mto.com

Kuruvilla J. Olasa (admitted *pro hac vice*)  
James R. Salzmann (admitted *pro hac vice*)  
Miranda E. Rehaut (admitted *pro hac vice*)  
Adeel Mohammadi (admitted *pro hac vice*)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, California 90071  
(213) 683-9100  
kuruvilla.olasa@mto.com  
james.salzmann@mto.com  
miranda.rehaut@mto.com  
adeel.mohammadi@mto.com

*Counsel for Plaintiff*