

PLAINTIFF’S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), Plaintiff American Oversight respectfully moves this Court for urgent preliminary relief as follows:

- (1) Order Defendants to produce to Plaintiff by March 31, 2026, or at least ten (10) days ahead of Attorney General Pam Bondi’s upcoming deposition by the United States House Committee on Oversight and Government Reform, whichever is sooner:
 - a. All non-exempt records, or non-exempt portions thereof, responsive to the FOIA requests at issue in this lawsuit; or
 - b. To the extent Defendants determine that they have already publicly released all records responsive to Plaintiff’s requests, order Defendants to produce sworn declarations to that effect, with an index that clearly identifies (by Bates number, hyperlink/URL, or other means) each such record and the date of release.
- (2) Order such other relief as the Court deems just.

* * *

This Motion is based on the Complaint, ECF No. 1, the accompanying Memorandum of Law in Support of Plaintiff’s Motion for a Preliminary Injunction and Declaration of Elizabeth Haddix, and the Freedom of Information Act, 5 U.S.C. § 552(a)(4)(B). Pursuant to Local Rule 65.1(d), American Oversight asks that the Court schedule a hearing on this Motion at the Court’s earliest convenience.

Pursuant to Local Rule 7(m), Plaintiff conferred with counsel for Defendants on March 12, March 13, and again on March 16, 2026, to narrow any issues of disagreement about the relief

requested before filing this motion. As of this filing, Defendants have not agreed to produce all non-exempt responsive records in advance of Attorney General Bondi's deposition, and do not consent to this motion. Haddix Decl. ¶ 11, Attach. B.

In light of the urgency of this matter, Plaintiff respectfully requests that the Court grant the motion and issue the preliminary injunction. Should Defendants grant Plaintiff's request for expedited processing and agree to a production schedule that ensures production of all responsive records prior to Attorney General Bondi's deposition before the House Oversight Committee, Plaintiff will promptly withdraw this motion to conserve judicial resources.

Dated: March 16, 2026

Respectfully submitted,

/s/ Elizabeth Haddix
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