

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

JOYCE BEATTY,

Plaintiff,

v.

DONALD J. TRUMP *et al.*,

Defendants.

No. 25-cv-4480 (CRC)

**COMBINED MOTION FOR TEMPORARY RESTRAINING ORDER AND
FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiff Joyce Beatty respectfully submits this combined motion, through undersigned counsel, to request a Temporary Restraining Order and a Preliminary Injunction in the above-captioned case, which challenges Defendants’ unlawful efforts to rename, shutter, and gut the John F. Kennedy Center for the Performing Arts (“Kennedy Center”).

Pursuant to LCvR 65.1(a), Plaintiff moves for an immediate temporary restraining (“TRO”) to preclude Defendants from excluding Plaintiff, as a full member of the Board of Trustees (“Board”) of the Kennedy Center, from attending (whether in person or remotely) and participating in an upcoming meeting of the Board scheduled for **March 16, 2026**, at which the Board is expected to decide on whether to formally approve President Trump’s announced plan to close the Center for two years in order to “completely rebuild” it. As explained more fully in the attached Memorandum of Law, Plaintiff has every reason to expect that, without relief, she will be excluded from participating in that meeting—to vote, to voice her dissent to the planned shuttering and demolition of the Center, and even to be permitted to attend. Plaintiff also seeks

access to critical information, in Defendants' possession, related to the underlying proposal to close and rebuild the Kennedy Center (including plans, timelines, and budget documents), which is necessary to allow her and other members to meaningfully exercise their fiduciary duties at the scheduled March 16 meeting. Because of the urgency—which is a creature of Defendants' own making—Plaintiff respectfully asks that the Court hear and rule on her motion for TRO by **March 15, 2026**, at the latest.

In the interests of judicial economy and cognizant of the extraordinary nature of a TRO, Plaintiff has limited her request for a TRO to the relief necessary to address the harms that will unquestionably become irreparable with the occurrence of the March 16, 2026 Board meeting. But Plaintiff also seeks preliminary injunctive relief to prevent Defendants from undertaking further steps toward effectuating the Center's closure (which has already begun, notwithstanding the lack of Board approval), as well as any steps toward tearing down or "rebuilding" the structure, before this Court has the opportunity to reach a final resolution in this case. As described more fully in the accompanying Memorandum, Plaintiff is likely to prevail on her claims that the unilateral closure and "rebuilding" of the Kennedy Center are unlawful. Preliminary injunctive relief is needed because the process of closing the Kennedy Center has already begun, and the more steps that are taken to implement the unlawful closure, the greater the irreparable harm to Plaintiff, the Center, and the public at large—harm which cannot be reversed even if Plaintiff prevails at the conclusion of this litigation.

Accordingly, and for the reasons set forth in Plaintiff's Memorandum of Law and supporting evidence, Plaintiff respectfully requests that the Court issue:

- 1) A TRO (a) preventing Defendants from excluding Plaintiff from participating in the upcoming March 16, 2026, meeting of the Board, including to attend (whether

in person or by remote electronic means), to voice her opinions, and to vote; and (b) requiring Defendants to provide Plaintiff (and other trustees) in advance of that March 16, 2026, with key documents and information necessary to evaluate the propriety of closing the Kennedy Center for two years and “rebuilding” it.

- 2) A preliminary injunction enjoining Defendants from taking any steps to implement the plan to close the Kennedy Center and “rebuild” it, while this litigation is pending.

A proposed Temporary Restraining Order and proposed Preliminary Injunction are both submitted herewith.

Dated: March 6, 2026

Respectfully submitted,

/s/ Norman Eisen

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** Application for admission forthcoming;
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