

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

JOYCE BEATTY,

Plaintiff,

v.

DONALD J. TRUMP *et al.*,

Defendants.

No. 25-cv-4480 (CRC)

MOTION FOR EMERGENCY INJUNCTIVE RELIEF

Plaintiff Joyce Beatty respectfully submits this motion, through undersigned counsel, to request emergency injunctive relief in the above-captioned case. As explained more fully in the attached Memorandum of Law, on August 13, 2026, Defendants once again voted to place Donald Trump’s name on the Kennedy Center. Specifically, a resolution passed at the Board of Trustees meeting (the “August 13 Resolution”) calls for (1) the inscription “Renovated and Restored by President Donald J. Trump” to be placed under President Kennedy’s name on the Center’s façade, (2) the inscription “Endowed by the Trump Kennedy Center Fund” to be placed under the first inscription, and (3) the site of the Kennedy Center to be named the “President Donald J. Trump Plaza.” These actions are clear violations of the Kennedy Center statute as interpreted by the Court in its May 29, 2026, decision, in which the Court held that “the Center is to be named for President Kennedy, and it cannot bear any other formal name or public memorial based on the Board’s unilateral say-so.” Mem. Op., ECF No. 50 at 2.

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

- 1) A temporary stay (whether characterized as administrative or in equity) of the

August 13 Resolution during the pendency of this motion.

- 2) A permanent injunction enjoining Defendants from taking any steps to implement the August 13 Resolution.

The proposed stay and injunction orders are submitted herewith.

Dated: August 20, 2026

Respectfully submitted,

/s/ Nathaniel A.G. Zelinsky

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