UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MICHAEL LEMMON, et al., Plaintiffs, v. DONALD J. TRUMP, et al., Defendants.	Civil Action No. 26-cv-544 (TSC)

PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Local Civil Rule 65.1(a), Plaintiffs Michael Lemmon, Shaun Byrnes, Jon Gundersen, and Calder Loth hereby move for a temporary restraining order, to remain in effect for fourteen days. Specifically, Plaintiffs request that this Court restrain Defendants Vince Haley, Executive Office of the President, and National Park Service from taking any steps to construct or to direct or facilitate construction of any structure in Memorial Circle absent congressional authorization, designation by Congress of a project sponsor, and compliance with all other statutory and regulatory prerequisites. Doing so would permit this Court time to rule on the parties' pending motions for summary judgment or to set a briefing schedule for a motion for a preliminary injunction. Undersigned counsel certifies that he emailed this motion and accompanying memorandum of law and proposed order to counsel for Defendants today at 1:50 PM Eastern.

Dated: September 4, 2026

Respectfully submitted,
/s/ Nicolas A. Sansone
Nicolas A. Sansone (DC Bar No. 1686810)
Wendy Liu (DC Bar No. 1600942)
Allison M. Zieve (DC Bar No. 424786)
Public Citizen Litigation Group
1600 20th Street NW
Washington, DC 20009
(202) 588-1000

Counsel for Plaintiffs