

Exhibit A

From: [Humphreys, Bradley \(CIV\)](#)
To: [Hu, April](#); [Arnold, Ariana \(USAMD\)](#); [Hall, Emily \(CIV\)](#); [Shapiro, Elizabeth \(CIV\)](#)
Cc: [Schwab, John](#); [Scott, Carson J.](#); [Mark Hanna](#); [David Rodwin](#); [Larry Schwartztol](#); [Kristy Parker](#)
Subject: RE: AFT v. Bessent - Case No. 8:25-cv-00430
Date: Tuesday, March 4, 2025 11:06:55 AM

Hi April –

Please include the following language in your letter regarding our position:

Defendants’ position with respect to the relief requested in this letter, is that, as noted in the Joint Status Report, the Court may—if the Court concludes that good cause exists—extend the TRO beyond the current expiration date of March 10, 2025, at 8:00 a.m. consistent with Rule 65(b)(2) of the Federal Rules of Civil Procedure. Defendants do not consent but do not intend to file a separate response regarding Plaintiffs’ request for extension of the TRO through March 17, 2025, at 5:00 p.m., the date of the preliminary Injunction hearing, which is set for 10:30 a.m. on March 17, 2025.

Thanks,
Brad

From: Hu, April <April.Hu@mto.com>
Sent: Tuesday, March 04, 2025 9:41 AM
To: Humphreys, Bradley (CIV) <Bradley.Humphreys@usdoj.gov>; Arnold, Ariana (USAMD) <Ariana.Arnold@usdoj.gov>; Hall, Emily (CIV) <Emily.Hall@usdoj.gov>; Shapiro, Elizabeth (CIV) <Elizabeth.Shapiro@usdoj.gov>
Cc: Schwab, John <John.Schwab@mto.com>; Scott, Carson J. <Carson.Scott@mto.com>; Mark Hanna <mhanna@murphyllc.com>; David Rodwin <drodwin@murphyllc.com>; Larry Schwartztol <lschwartztol@law.harvard.edu>; Kristy Parker <kristy.parker@protectdemocracy.org>
Subject: [EXTERNAL] RE: AFT v. Bessent - Case No. 8:25-cv-00430

Brad,

Plaintiffs will file a letter with the Court today. Please advise us before noon ET whether Defendants consent to the extension of a TRO until March 17, consistent with the Joint Status Report.

Best,

April

Xiaonan April Hu | **Munger, Tolles & Olson LLP**
601 Massachusetts Ave. NW, Suite 500E | Washington, DC 20001-5369
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any unauthorized person. If you have received this message in error, do not read it. Please delete it without copying it, and notify the sender by separate e-mail so that our address record can be corrected.
Thank you.

From: Humphreys, Bradley (CIV) <Bradley.Humphreys@usdoj.gov>
Sent: Monday, March 3, 2025 8:56 PM
To: Hu, April <April.Hu@mto.com>; Arnold, Ariana (USAMD) <Ariana.Arnold@usdoj.gov>; Hall, Emily (CIV) <Emily.Hall@usdoj.gov>; Shapiro, Elizabeth (CIV) <Elizabeth.Shapiro@usdoj.gov>
Cc: Schwab, John <John.Schwab@mto.com>; Scott, Carson J. <Carson.Scott@mto.com>; Mark Hanna <mhanna@murphypllc.com>; David Rodwin <drodwin@murphypllc.com>; Larry Schwartztol <lschwartztol@law.harvard.edu>; Kristy Parker <kristy.parker@protectdemocracy.org>
Subject: RE: AFT v. Bessent - Case No. 8:25-cv-00430

Hi April,

Thanks for reaching out. Defendants take a different view. While we said in the JSR that the court may extend the TRO until March 24 or the hearing date, whichever is sooner, the court has not yet done so. Plaintiffs, of course, may ask for that additional relief, but we don't believe it's a matter of clarification.

Best,
Brad

From: Hu, April <April.Hu@mto.com>
Sent: Monday, March 03, 2025 4:31 PM
To: Arnold, Ariana (USAMD) <Ariana.Arnold@usdoj.gov>; Hall, Emily (CIV) <Emily.Hall@usdoj.gov>; Shapiro, Elizabeth (CIV) <Elizabeth.Shapiro@usdoj.gov>; Humphreys, Bradley (CIV) <Bradley.Humphreys@usdoj.gov>
Cc: Schwab, John <John.Schwab@mto.com>; Scott, Carson J. <Carson.Scott@mto.com>; Mark Hanna <mhanna@murphypllc.com>; David Rodwin <drodwin@murphypllc.com>; Larry Schwartztol <lschwartztol@law.harvard.edu>; Kristy Parker <kristy.parker@protectdemocracy.org>
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Counsel:

We did not see a local rule or guidance from Judge Boardman's chambers that disfavored communications to chambers with all counsel copied. That said, we are happy to file a joint letter seeking clarification from the Court that the TRO is extended until March 17, if that is what Defendants prefer.

Best,

April

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Thank you.

From: Arnold, Ariana (USAMD) <Ariana.Arnold@usdoj.gov>
Sent: Monday, March 3, 2025 4:27 PM
To: Hu, April <April.Hu@mto.com>; Hall, Emily (CIV) <Emily.Hall@usdoj.gov>; Shapiro, Elizabeth (CIV) <Elizabeth.Shapiro@usdoj.gov>; Humphreys, Bradley (CIV) <Bradley.Humphreys@usdoj.gov>
Cc: Schwab, John <John.Schwab@mto.com>; Scott, Carson J. <Carson.Scott@mto.com>; Mark Hanna <mhanna@murphypllc.com>; David Rodwin <drodwin@murphypllc.com>; Larry Schwartztol <lschwartztol@law.harvard.edu>; Kristy Parker <kristy.parker@protectdemocracy.org>
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Any contact with chambers should be by joint email with all parties copied.

Better yet, you should do so in a letter filed via ECF.

Contacting chambers directly is disfavored.

From: Hu, April <April.Hu@mto.com>
Sent: Monday, March 3, 2025 4:25 PM
To: Hall, Emily (CIV) <Emily.Hall@usdoj.gov>; Arnold, Ariana (USAMD) <Ariana.Arnold@usdoj.gov>; Shapiro, Elizabeth (CIV) <Elizabeth.Shapiro@usdoj.gov>; Humphreys, Bradley (CIV) <Bradley.Humphreys@usdoj.gov>
Cc: Schwab, John <John.Schwab@mto.com>; Scott, Carson J. <Carson.Scott@mto.com>; Mark Hanna <mhanna@murphypllc.com>; David Rodwin <drodwin@murphypllc.com>; Larry Schwartztol <lschwartztol@law.harvard.edu>; Kristy Parker <kristy.parker@protectdemocracy.org>
Subject: [EXTERNAL] AFT v. Bessent - Case No. 8:25-cv-00430

Counsel:

We intend to contact Judge Boardman's career law clerk tomorrow, copying Defendants, to ask that the Court clarify that the temporary restraining order extends to March 17 consistent with the parties' Joint Status Report. Please let me know before the end of today whether Defendants have any objections.

Best,

April

Xiaonan April Hu | Munger, Tolles & Olson LLP
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