

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ELECTRONIC PRIVACY INFORMATION CENTER;
1519 New Hampshire Avenue NW,
Washington, D.C. 20036

DOE 1;

Plaintiffs,

v.

U.S. OFFICE OF PERSONNEL MANAGEMENT
1900 E Street NW
Washington, D.C. 20415

CHARLES EZELL, in his official capacity as Acting
Director of the Office of Personnel Management;
1900 E Street NW
Washington, D.C. 20415

U.S. DEPARTMENT OF THE TREASURY
1500 Pennsylvania Avenue NW
Washington, D.C.

SCOTT BESSENT, in his official capacity as
Secretary of the Treasury;
1500 Pennsylvania Avenue NW
Washington, D.C. 20220

U.S. DOGE SERVICE;
736 Jackson Place NW
Washington, DC 20503

ACTING U.S. DOGE SERVICE ADMINISTRATOR
736 Jackson Place
Washington, D.C. 20503

U.S. DOGE SERVICE TEMPORARY
ORGANIZATION;
736 Jackson Place
Washington, D.C. 20503

Defendants.

Civil No. 1:25-cv-00255

PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Electronic Privacy Information Center (“EPIC”) and Doe 1 hereby move for a temporary restraining order for the following relief:

(1) enjoining the Department of Treasury (“Treasury”) and Office of Personnel Management (“OPM”) from allowing DOGE-affiliated personnel to access Bureau of Fiscal Services or Enterprise Human Resources Integration systems;

(2) enjoining DOGE-affiliated personnel from accessing Treasury or OPM systems containing personally identifiable information except consistent with relevant SORNs; and

(3) requiring Defendants Treasury and OPM to file a status report within 24 hours of the issuance of a Temporary Restraining Order, confirming that DOGE-affiliated personnel no longer have access to EHRI or BFS systems.

Counsel emailed the three Assistant Directors of the Federal Programs Branch immediately prior to making this application to the Court, and provided them with electronic copies of the complaint, motion for temporary restraining order, and accompanying brief, declarations, and proposed order via e-mail before completing this electronic filing.

Dated: February 12, 2025

Respectfully submitted,

/s/ Matthew B. Kaplan
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* pro hac vice *application forthcoming*

Counsel for Plaintiffs