

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

JOHN DOES 1-6, <i>et al.</i>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 25-300 (AJT/LRV)
	)	
U.S. OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, <i>et al.</i>	)	
	)	
Defendants.	)	

**PLAINTIFFS’ MOTION FOR A PRELIMINARY INJUNCTION ORDER**

1. Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs move for to enjoin Defendants the Central Intelligence Agency and the Hon. John Ratcliffe from terminating Plaintiffs without giving them the chance to appeal their termination and seek reassignment.

2. As detailed in the accompanying Memorandum of Law, Plaintiffs expect Defendants to terminate them as soon as March 31, 2025, causing immediate, irreparable harm.

WHEREFORE, Plaintiffs respectfully request that the Court enter a preliminary injunction to prevent Defendants from terminating the employment of Plaintiffs and those similarly situated, with no appeal or reassignment rights, until further order of this Court, as set forth in the attached proposed Order.

Dated: March 27, 2025

Respectfully submitted,

/s/ Kevin T. Carroll

Kevin T. Carroll, VSB No. 95292

Kia Rahnama, VSB No. 93718

**Fluet**

1751 Pinnacle Dr., Ste. 1000, Tysons, VA 22102

T: (703) 590-1234

F: (703) 590-0366

kcarroll@fluet.law

krahnama@fluet.law

e-file@fluet.law

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 27, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to counsel of record for all parties.

/s/ Kevin T. Carroll

Kevin T. Carroll, Esq.