

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

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

PLAINTIFFS’ MOTION FOR A TEMPORARY RESTRAINING ORDER

1. Pursuant to Federal Rule of Civil Procedure 65(b), Plaintiffs U.S. intelligence officers John Does 1-6 and Jane Does 1-5 hereby move for a temporary restraining order enjoining Defendants the U.S. Office of the Director of National Intelligence, U.S. Central Intelligence Agency, the Hon. Tulsi Gabbard, Director of National Intelligence and the Hon. John Ratcliffe, Director of the Central Intelligence Agency from terminating Plaintiffs’ employment, or placing them on leave without pay (“LWOP”) until further order of this Court. Plaintiffs ask that the Court similarly enjoin Defendants from terminating or placing on LWOP those similarly situated to Plaintiffs—to wit, Intelligence Community personnel thought to be assigned to temporary positions regarding diversity, equity, inclusion and accessibility.

2. As detailed in the accompanying Memorandum of Law, Plaintiffs expect the Defendants to move to terminate them as soon as February 18, 2025, causing them immediate and irreparable harm.

WHEREFORE, Plaintiffs respectfully request that the Court enter a temporary restraining order against Defendants to prevent them from terminating the employment of Plaintiffs and those

similarly situated, or placing them on LWOP, until further order of this Court, as set forth in the attached proposed Order.

Dated: February 17, 2025

Respectfully submitted,

/s/ Kevin T. Carroll

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CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2025, a copy of the foregoing was mailed first class mail, postage prepaid, to:

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Office of General Counsel
1500 Tysons McLean Dr.
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/s/ Kevin T. Carroll
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