

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____	:	
NATIONAL ENDOWMENT FOR	:	
DEMOCRACY,	:	
	:	No. 1:25-cv-00648
<i>Plaintiff,</i>	:	
	:	
v.	:	
	:	
UNITED STATES, et al.,	:	
	:	
<i>Defendants.</i>	:	
_____	:	

PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiff National Endowment for Democracy (“the Endowment”) respectfully moves pursuant to Federal Rule of Civil Procedure 65 for a temporary restraining order. For the reasons presented in the memorandum in support of this motion, the Court should enter an order that would stop Defendants and those they supervise from impounding or otherwise interfering with the Endowment’s congressionally mandated funding. The precise contours of the order the Endowment seeks are provided in the proposed order attached to this motion.

Pursuant to Local Rule 65.1(a), counsel for Plaintiffs emailed the Director for the Federal Programs Branch of the Department of Justice, the Chief of the Civil Division of the U.S. Attorney’s Office in Washington, D.C., and the civil process clerk of that office on March 6, 2025, shortly before filing this motion, to provide them with electronic copies of this complaint, this motion for a temporary restraining order, the accompanying memorandum, the unsealed declarations supporting the motion and associated exhibits, and the proposed order. Defendants will separately be served in hard copy, pursuant to this Court’s local rules, with the motion to seal and sealed declarations.

Dated: March 6, 2025

Respectfully submitted,

/s/ Donald B. Verrilli, Jr.

Donald B. Verrilli, Jr. (D.C. Bar No. 420434)

Ginger D. Anders (D.C. Bar No. 494471)

Jeremy S. Kreisberg (D.C. Bar No. 1048346)

Helen E. White (D.C. Bar No. 1741368)*

Esthena L. Barlow (D.C. Bar No. 90000252)*

MUNGER, TOLLES & OLSON LLP

601 Massachusetts Avenue NW, Suite 500E

Washington, D.C. 20001

(202) 220-1100

Donald.Verrilli@mto.com

Ginger.Anders@mto.com

Jeremy.Kreisberg@mto.com

Helen.White@mto.com

Esthena.Barlow@mto.com

Gabriel M. Bronshteyn (*pro hac vice* forthcoming)

MUNGER, TOLLES & OLSON LLP

560 Mission Street, Twenty-Seventh Floor

San Francisco, California 94105

(415) 512-4000

Gabriel.Bronshteyn@mto.com

* *admission pending*

*Attorneys for the National Endowment for
Democracy*

CERTIFICATE OF SERVICE

I hereby certify that on March 6, 2025, I filed the foregoing document with the Clerk of Court for the United States District Court for the District of Columbia using the court's CM/ECF filing.

I further certify that a copy of the foregoing will be deposited with the United States Postal Service, for delivery to the below Defendants and to the Department of Justice by Certified Mail:

United States Department of Treasury 1500 Pennsylvania Ave., NW Washington, DC 20220	Scott Bessent Secretary United States Department of the Treasury 1500 Pennsylvania Ave., NW Washington, DC 20220
United States Office of Management and Budget 725 17th Street, NW Washington, DC 20503	Russell Vought Director United States Office of Management and Budget 725 17th Street, NW Washington, DC 20503
United States Department of State 2201 C Street NW Washington, DC 20520	Marco Rubio Secretary United States Department of State 2201 C Street, NW Washington, DC 20520
Edward R. Martin Jr. United States Attorney for the District of Columbia Civil Process Clerk U.S. Attorney's Office for D.C. 601 D Street, NW Washington, DC 20530	Pamela Bondi Attorney General of the United States U.S. Department of Justice 950 Pennsylvania Ave., NW Washington, DC 20530
United States Department of Health and Human Services Hubert H. Humphrey Building 200 Independence Ave., SW Washington, DC 20201	Robert F. Kennedy, Jr. Secretary U.S. Department of Health and Human Services Hubert H. Humphrey Building 200 Independence Ave., SW Washington, DC 20201
	Melissa Bruce Director Program Support Center U.S. Department of Health and Human Services

	Hubert H. Humphrey Building 200 Independence Ave., SW Washington, DC 20201
--	--

/s/ Donald B. Verrilli, Jr.

Donald B. Verrilli, Jr.

MUNGER, TOLLES & OLSON LLP

601 Massachusetts Ave., NW, Suite 500E

Washington, DC 20001

Telephone: (202) 220-1100

donald.verrilli@mtto.com

*Attorney for National Endowment for
Democracy*