

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

THE ASSOCIATED PRESS,

Plaintiff,

v.

TAYLOR BUDOWICH, in his official
capacity as White House Deputy Chief of Staff;
KAROLINE LEAVITT, in her official capacity
as White House Press Secretary; and SUSAN
WILES, in her official capacity as White
House Chief of Staff,

Defendants.

Case No. _____

Emergency Hearing Requested

**PLAINTIFF THE ASSOCIATED PRESS'S
MOTION FOR TEMPORARY RESTRAINING ORDER**

Plaintiff The Associated Press (“AP”), by its attorneys, moves pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Rule 65.1, for a temporary restraining order (“TRO”) requiring Defendants to immediately rescind the ban on the AP’s access to the Oval Office, Air Force One, and other limited spaces when such spaces are made open to other members of the White House press pool. As set forth in greater detail in the accompanying memorandum, the AP meets each requirement for a TRO: (1) the AP is likely to succeed on the merits of its claims that Defendants’ actions violate the AP’s due process and First Amendment rights; (2) Defendants’ violation of the AP’s constitutional rights, especially its “First Amendment freedoms, . . . unquestionably constitutes irreparable injury,” *see Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality opinion); *Pursuing Am. ’s Greatness v. Fed. Election Comm’n*, 831 F.3d 500, 511 (D.C. Cir. 2016) (same); and (3) the balance of the equities and the public interest strongly favor injunctive relief.

WHEREFORE, Plaintiff the AP respectfully requests that its Motion be GRANTED and that this Court enter a temporary restraining order requiring Defendants to immediately rescind the ban on the AP's access to the Oval Office, Air Force One, and other limited spaces when such spaces are made open to other members of the White House press pool until the AP's motion for a preliminary injunction is decided.

Dated: February 21, 2025

Respectfully submitted,

BALLARD SPAHR LLP

/s/ Jay Ward Brown

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