UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JOHN AND JANE DOES 1-9, et al.,

Plaintiffs,

v.

Civil Action No. 25-0325 (JMC)

DEPARTMENT OF JUSTICE,

Defendant.

FEDERAL BUREAU OF INVESTIGATION AGENTS ASSOCIATION, et al.,

Plaintiffs,

v.

Civil Action No. 25-0328 (JMC)

DEPARTMENT OF JUSTICE, et al.,

Defendants.

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

NOW COMES the consolidated Plaintiffs, by and through their undersigned counsel, pursuant to Rule 65 of the Federal Rules of Civil Procedure to hereby respectfully move for a preliminary injunction against the Defendants.

To the extent the Local Rules required the Plaintiffs to consult with the Defendants concerning the non-dispositive portions of this Motion, the Defendants have signified their opposition and a briefing schedule is already in place.

A Memorandum of Law and proposed Order are attached.

Dated: February 24, 2025

Respectfully submitted,

LAW OFFICE OF MARK S. ZAID, P.C.

By: Mark S. Zaid

MARK S. ZAID, D.C. Bar #440532 BRADLEY P. MOSS, D.C. Bar #975905 1250 Connecticut Avenue, NW, Suite 700 Washington, D.C. 20036 (202) 498-0011 Mark@MarkZaid.com Brad@MarkZaid.com Attorneys for John Does 1,3-4, Jane Does 1-3 (25-328)

CENTER FOR EMPLOYMENT JUSTICE

By: Pamela M. Keith

PAMELA M. KEITH, D.C. Bar #448421

SCOTT M. LEMPERT, D.C. Bar #1045184
650 Massachusetts Ave., NW, Suite 600

Washington, DC 20001
(202) 800-0292

pamkeith@centerforemploymentjustice.com
Slempert@centerforemploymentjustice.com
Attorneys for John and Janes Does 1-9, et al.
(25-325)

STATE DEMOCRACY DEFENDERS FUND

By: Norman L. Eisen

Norman L. Eisen D.C. Bar # 435051
Pooja Chaudhuri, D.C. Bar # 888314523
600 Pennsylvania Avenue, SE, #15180
Washington, D.C. 20003
(202) 594-9958
norman@statedemocracydefenders.org
pooja@statedemocracydefenders.org
Attorneys for John Does 1,3-4,
Jane Does 1-3 (25-328)

KOSKOFF, KOSKOFF & BIEDER, PC

By: Margaret Donovan

Christopher Mattei, Bar # 27500 (pro hac vice)
Margaret Donovan, Bar # 31787 (pro hac vice)
350 Fairfield Ave., Suite 501
Bridgeport, CT 06604
(203) 336-4421
cmattei@koskoff.com
mdonovan@koskoff.com
Attorneys for Federal Bureau of Investigation
Agents Association (25-328)