

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PERKINS COIE LLP,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE,
FEDERAL COMMUNICATIONS
COMMISSION, OFFICE OF
MANAGEMENT AND BUDGET, EQUAL
EMPLOYMENT OPPORTUNITY
COMMISSION, OFFICE OF PERSONNEL
MANAGEMENT, GENERAL SERVICES
ADMINISTRATION, OFFICE OF THE
DIRECTOR OF NATIONAL
INTELLIGENCE, THE UNITED STATES
OF AMERICA, and, in their official
capacities, PAMELA J. BONDI, BRENDAN
CARR, RUSSELL T. VOUGHT, ANDREA
R. LUCAS, CHARLES EZELL, STEPHEN
EHEKIAN, and TULSI GABBARD,

Defendants.

Case No. 25-cv-716

**EXPEDITED HEARING
REQUESTED**

**PLAINTIFF PERKINS COIE LLP'S MOTION
FOR A TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1, Plaintiff Perkins Coie LLP, by undersigned counsel, respectfully requests that the Court issue a temporary restraining order enjoining Defendants from enforcing or implementing the provisions of Sections 1, 3, and 5 of the President's March 6, 2025 Executive Order entitled "Addressing Risks from Perkins Coie LLP," until such time as the Court can further consider the merits of Plaintiff's claims and any forthcoming motion for a preliminary injunction. This emergency relief

is necessary due to the exigency of the circumstances and the irreparable injuries that the requested temporary restraining order is intended to prevent.

The grounds for this motion are set forth in the attached memorandum of law and its supporting declarations and exhibits. A proposed order and a certification of compliance with Local Civil Rule 65.1 are attached hereto.

Dated: March 11, 2025

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: /s/ Dane H. Butswinkas
Dane H. Butswinkas (D.C. Bar #425056)

F. Lane Heard III (D.C. Bar #291724)
Christopher N. Manning (D.C. Bar #464069)
Ryan T. Scarborough (D.C. Bar #466956)
Malachi B. Jones (D.C. Bar #455555)
Charles Davant IV (D.C. Bar #484305)
David S. Kurtzer-Ellenbogen (D.C. Bar #489559)
Jesse T. Smallwood (D.C. Bar #495961)

Amy M. Saharia (D.C. Bar #981644)
Matthew B. Nicholson (D.C. Bar #1013418)
Carol J. Pruski (D.C. Bar #1006941)*
Charles L. McCloud (D.C. Bar #1012047)*
Krystal C. Durham (D.C. Bar # 987768)
Eden Schiffmann (D.C. Bar #1035019)

680 Maine Avenue, SW
Washington, DC 20024
(202) 434-5000

Counsel for Plaintiff Perkins Coie LLP

** DDC bar application pending*