

**UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA**

RFE/RL, INC.,

*Plaintiff,*

v.

Case No. 1:25-cv-00779

KARI LAKE, in her official capacity as Senior Advisor to the Acting CEO of the United States Agency for Global Media;

VICTOR MORALES, in his official capacity as acting Chief Executive Officer of the United States Agency for Global Media; and

UNITED STATES AGENCY FOR GLOBAL MEDIA,

*Defendants.*

**PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER AND  
PRELIMINARY INJUNCTION**

Plaintiff RFE/RL, Inc. (“RFE/RL”), respectfully moves pursuant to Federal Rule of Civil Procedure 65 for a temporary restraining order and preliminary injunction. For the reasons presented in the memorandum in support of this motion, the Court should enter orders that would enjoin Defendants from impounding or otherwise interfering with RFE/RL’s congressionally appropriated funding. The specific relief that RFE/RL seeks is provided in the proposed temporary restraining and preliminary injunction orders attached to this motion.

On March 18, 2025, counsel for RFE/RL emailed the Directors and Assistant Director for the Federal Programs Branch of the Department of Justice a copy of the complaint filed on March 18, 2025, and, pursuant to Local Rule 65.1(a), provided notice that RFE/RL intends to file

a motion for a temporary restraining order and preliminary injunction on March 19, 2025. Shortly before filing this Motion for a Temporary Restraining Order and Preliminary Injunction, counsel for RFE/RL emailed Defendants' representatives in the Federal Programs Branch of the Department of Justice the motion and accompanying brief, statutory addendum, declarations, exhibit, and proposed orders.

March 19, 2025

Respectfully submitted,

/s/ Marney L. Cheek

Marney L. Cheek (D.C. Bar No. 470596)

David Zionts (D.C. Bar No. 1013523)

Thomas Brugato (D.C. Bar No. 995170)

COVINGTON & BURLING LLP

850 Tenth Street, NW

Washington, DC 20001-4956

(202) 662-6000

mcheek@cov.com

dzionts@cov.com

tbrugato@cov.com

*Attorneys for Plaintiff RFE/RL, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 19, 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 system.

Further, I hereby certify that I have provided notice of this lawsuit by depositing with the United States Postal Service the foregoing document and its attachments to the following recipients:

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|---|--|
| Kari Lake<br>Senior Advisor to the Acting CEO<br>United States Agency for Global Media<br>Wilbur J. Cohen Federal Building<br>330 Independence Avenue SW<br>Washington, DC 20237    | United States Agency for Global Media<br>Wilbur J. Cohen Federal Building<br>330 Independence Avenue SW<br>Washington, DC 20237                                |
| Victor Morales<br>Acting Chief Executive Officer<br>United States Agency for Global Media<br>Wilbur J. Cohen Federal Building<br>330 Independence Avenue SW<br>Washington, DC 20237 | Pamela Bondi<br>Attorney General of the United States<br>U.S. Department of Justice<br>950 Pennsylvania Avenue NW<br>Washington, DC 20530                      |
| Edward R. Martin Jr.<br>United States Attorney for the District of Columbia<br>Civil Process Clerk<br>U.S. Attorney's Office for D.C.<br>601 D Street NW<br>Washington, DC 20530    | Diane Kelleher<br>Joseph Borson<br>Julia Heiman<br>Federal Programs Branch<br>U.S. Department of Justice<br>950 Pennsylvania Avenue NW<br>Washington, DC 20530 |

/s/ Marney L. Cheek  
Marney L. Cheek (D.C. Bar No. 470596)  
COVINGTON & BURLING LLP  
850 Tenth Street, NW  
Washington, DC 20001-4956  
(202) 662-6000  
mcheek@cov.com

*Attorney for Plaintiff RFE/RL, Inc.*