

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RADIO FREE ASIA,

Plaintiff,

v.

UNITED STATES, et al.,

Defendants.

No.1:25-cv-907

PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER

Plaintiff Radio Free Asia (“RFA”) 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 RFA’s congressionally appropriated and mandated funding. The precise contours of the order that RFA seeks are provided in the proposed order attached to this motion.

Pursuant to Local Rule 65.1(a), counsel for Plaintiff emailed counsel for the Department of Justice in the Federal Programs Branch, 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 28, 2025, shortly before filing this motion, to provide them with electronic copies of this motion for a temporary restraining order, the accompanying memorandum, the declarations supporting the motion and associated exhibit, and the proposed order.

March 28, 2025

/s/ Kristin Bateman

Kristin Bateman*^

Jennifer Fountain Connolly (D.C. Bar No. 1019148)*

Robin F. Thurston (D.C. Bar No. 1531399)

Skye L. Perryman (D.C. Bar No. 984573)

Democracy Forward Foundation

P.O. Box 34553

Washington, D.C. 20043

(202) 448-9090

kbateman@democracyforward.org

jconnolly@democracyforward.org

rthurston@democracyforward.org

sperryman@democracyforward.org

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.Verilli@mto.com

Ginger.Anders@mto.com

Jeremy.Kreisberg@mto.com

Helen.White@mto.com

Esthena.Barlow@mto.com

Hailyn J. Chen**

Adeel Mohammadi**

MUNGER, TOLLES & OLSON LLP

350 S. Grand Avenue, Fiftieth Floor

Los Angeles, California 90071

(213) 683-9100

Hailyn.Chen@mto.com

Adeel.Mohammadi@mto.com

Gabriel M. Bronshteyn**

MUNGER, TOLLES & OLSON LLP

560 Mission Street, Twenty-Seventh Floor

San Francisco, California 94105

(415) 512-4000

Gabriel.Bronshteyn@mto.com

*Admission pending

***Pro hac vice* application forthcoming

^Admitted only in California; practice supervised by members of the D.C. Bar

Attorneys for Radio Free Asia

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 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 Avenue, NW Washington, D.C. 20220	Scott Bessent Secretary United States Department of the Treasury 1500 Pennsylvania Avenue, NW Washington, D.C. 20220
United States Office of Management and Budget 725 17th Street, NW Washington, D.C. 20503	Russell Vought Director United States Office of Management and Budget 725 17th Street, NW Washington, D.C. 20503
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, D.C. 20530	Pamela Bondi Attorney General of the United States U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, D.C. 20530
United States Agency for Global Media Wilbur J. Cohen Federal Building 330 Independence Avenue, SW Washington, D.C. 20237	Kari Lake Senior Advisor to the Acting CEO United States Agency for Global Media Wilbur J. Cohen Federal Building 330 Independence Avenue, SW Washington, D.C. 20237
	Victor Morales Acting CEO United States Agency for Global Media Wilbur J. Cohen Federal Building 330 Independence Avenue, SW Washington, D.C. 20237

/s/ Donald B. Verrilli, Jr.

Donald B. Verrilli, Jr.

MUNGER, TOLLES & OLSON LLP

601 Massachusetts Avenue, NW, Suite 500E

Washington, D.C. 20001

Telephone: (202) 220-1100

donald.verrilli@mtol.com

Attorney for Radio Free Asia