

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL TREASURY EMPLOYEES UNION
800 K Street N.W., Suite 1000
Washington, D.C. 20001,

Plaintiff,

v.

DONALD J. TRUMP,
President of the United States
1600 Pennsylvania Avenue N.W.
Washington, D.C. 20500, *et al.*,

Defendants.

Case No. 1:25-cv-00935 (PLF)

**HEARING RESPECTFULLY
REQUESTED BY APRIL 25**

PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiff National Treasury Employees Union (NTEU), a labor union that represents nearly 160,000 federal government employees in thirty-seven agencies and departments, submits this motion for preliminary injunctive relief. NTEU respectfully requests a hearing on its motion during the period of April 21-25, 2025.

On March 27, 2025, Defendant Donald J. Trump issued an executive order that guts Congress's federal sector collective bargaining regime. NTEU seeks emergency relief to protect itself and the workers it represents from this unlawful attempt to eliminate collective bargaining for some two-thirds of the federal workforce. Absent emergency relief, NTEU will imminently lose over half of its revenue stream and over two-thirds of the workers that it represents. NTEU's very

existence will be threatened, and its bargaining power and influence at agencies where it still represents workers will be diminished in a way that cannot be undone.

For these reasons and those in the accompanying memorandum of points and authorities, NTEU asks this Court to preliminarily enjoin Section 2 of the Executive Order and the Office of Personnel Management's guidance on the Order's implementation.

Respectfully submitted,

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