

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

RADIO FREE ASIA,

*Plaintiff,*

v.

THE UNITED STATES OF AMERICA;  
UNITED STATES AGENCY FOR GLOBAL  
MEDIA; 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;  
OFFICE OF MANAGEMENT AND  
BUDGET; RUSSELL VOUGHT, in his official  
capacity as Director of United States Office of  
Management and Budget; UNITED STATES  
DEPARTMENT OF TREASURY; and SCOTT  
BESSENT, in his official capacity as United  
States Secretary of the Treasury,

*Defendants.*

Case No. 1:25-cv-00907-RCL

**MOTION OF REPORTERS COMMITTEE FOR FREEDOM OF THE PRESS AND  
COMMITTEE TO PROTECT JOURNALISTS FOR LEAVE TO FILE AMICI BRIEF**

Proposed amici curiae the Reporters Committee for Freedom of the Press  
("Reporters Committee") and the Committee to Protect Journalists (together, "amici")  
respectfully move this Court under Local Civil Rule 7(o) for leave to file the attached  
amici curiae brief in support of Plaintiff's Motion for a Temporary Restraining Order  
and Preliminary Injunction. The proposed brief is attached to this Motion.

1. This Court “has broad discretion to permit . . . participat[ion] [of] amici curiae,” and amicus participation is appropriate where amici have “relevant expertise and a stated concern for the issues at stake in [the] case.” *District of Columbia v. Potomac Elec. Power Co.*, 826 F. Supp. 2d 227, 237 (D.D.C. 2011). This Court has recognized that an amicus brief should “normally be allowed when . . . the amicus has unique information or perspective that can help the court beyond the help that the lawyers for the parties are able to provide.” *Cobell v. Norton*, 246 F. Supp. 2d 59, 62 (D.D.C. 2003) (quoting *Ryan v. Commodity Futures Trading Comm’n*, 125 F.3d 1062, 1063 (7th Cir. 1997)); *Jin v. Ministry of State Sec.*, 557 F. Supp. 2d 131, 137 (D.D.C. 2008) (same).

2. Amicus the Reporters Committee is an unincorporated nonprofit association of reporters and editors dedicated to defending the First Amendment and newsgathering rights of the press. The Reporters Committee routinely appears as amicus curiae in this Court and other federal courts where the federal government takes action that inhibits newsgathering or chills the independence of the press, including in recent challenges to the editorial independence of U.S. Agency for Global Media networks. *See, e.g., Widakuswara v. Lake*, No. 1:25-cv-02390, 2025 WL 945869, at \*10 (S.D.N.Y. Mar. 28, 2025) (citing brief of proposed amici in concluding that journalists at Voice of America faced irreparable harm if the agency was shuttered).

3. Amicus the Committee to Protect Journalists is an independent,

nonprofit organization that was founded in 1981 to promote press freedom worldwide. It defends the right of journalists to report the news without fear of reprisal. CPJ is a global organization headquartered in New York City. CPJ's board of directors is composed of prominent journalists, media executives, and leaders from related professions.

4. The amici brief highlights for the Court the bedrock importance of editorial independence at Radio Free Asia ("RFA"). Congress has required the networks to be afforded such independence, which is essential to maintaining the reputation and safety of RFA reporters abroad.

5. Amici are uniquely positioned to provide the Court with information and insight based on their experience advocating on behalf of reporters and media outlets. The proposed amici brief provides broader context on the centrality of editorial independence and freedom from interference by the President to RFA's ability to carry out its core journalistic functions.

6. Plaintiff consents to the filing of this amici brief. Amici contacted counsel for the United States by email at 7:07AM on April 10, 2025, to obtain their position on this motion but have not received a response as of this filing.

Dated: April 10, 2025

Respectfully submitted,

/s/ Bruce D. Brown

Bruce D. Brown

(D.C. Bar No. 457317)

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