

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

OPEN TECHNOLOGY FUND,

Plaintiff,

v.

KARI LAKE et al.,

Defendants.

Civil Action No. 1:25-cv-840-RCL

**NOTICE OF WITHDRAWAL OF
PLAINTIFF’S MOTION FOR
TEMPORARY RESTRAINING
ORDER**

Plaintiff, the Open Technology Fund (“OTF”), provides notice to the Court of the withdrawal of its Motion for a Temporary Restraining Order (the “Motion”). ECF 4.

Since filing the Motion, Defendants have withdrawn the termination of grant agreements. *See* ECF 13 and 15. On April 3, 2025, OTF received from Defendants a payment equal to the amount requested by OTF under its approved Financial Plan for OTF’s March operating expenses.

OTF withdraws the Motion without prejudice to seeking additional relief in a future motion. Notably, on April 1, 2025, OTF submitted its next regular monthly funding request per its Grant Agreements and Financial Plan for OTF’s April operational and programmatic expenses and currently awaits Defendant’s timely approval and disbursement of OTF’s congressionally appropriated funds. Accordingly, no emergency relief from the Court is requested by Plaintiff at this time.

Dated this 3rd day of April 2025.

Respectfully submitted,

VAN NESS FELDMAN, LLP

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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of April 2025, a true and correct copy of the foregoing was filed using the Court's CM/ECF filing system, which shall send notice to all counsel of record.

/s/ Patrick O. Daugherty
Patrick O. Daugherty