

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN BAR ASSOCIATION,

Plaintiff,

v.

U.S. DEPARTMENT OF JUSTICE *et al.*,

Defendants.

Case No. 1:25-cv-01263

**PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING
ORDER OR, IN THE
ALTERNATIVE, PRELIMINARY
INJUNCTION**

Pursuant to Local Civil Rule 65, Plaintiff American Bar Association (ABA) hereby moves for a temporary restraining order or, in the alternative, preliminary injunction barring Defendants from enforcing or otherwise giving effect to the termination of any grant to the American Bar Association's Commission on Domestic & Sexual Violence (ABA CDSV), including through the enforcement of closeout obligations; barring from re-obligating funds used to support ABA CDSV's grants; and requiring Defendants to take all steps necessary to ensure that the Department of Justice disburses funds on ABA CDSV's grants in the customary manner and in customary timeframes. As set forth in more detail in the accompanying memorandum, ABA is likely to succeed on the merits of its claims that Defendants violated the U.S. Constitution and the Administrative Procedure Act. ABA is suffering and will continue to suffer irreparable injury absent the requested relief, and the balance of equities and public interest are in ABA's favor.

Pursuant to Local Civil Rule 65.1(a), at 11:15 a.m. on April 24, 2025, counsel for the ABA emailed Alex Haas, Director of the Federal Programs Branch of the Department of Justice, to provide a copy of the complaint and, pursuant to Local Civil Rule 65.1(a), to

provide actual notice that ABA intended to file a motion for temporary restraining order or, in the alternative, preliminary injunction later that day. Counsel for ABA also provided the motion and accompanying brief, declarations, and proposed order to Mr. Haas before completing this electronic filing.

Dated: April 24, 2025

Respectfully submitted,

/s/ Brian Netter

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* *Full Admission Pending*

** *Pro Hac Vice forthcoming*

^ *Admitted only in New York; practice supervised by members of the D.C. bar*

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CERTIFICATE OF SERVICE

I hereby certify that on April 24, 2025, I filed the foregoing document with the Clerk of Court for the U.S. District Court for the District of Columbia using the court's CM/ECF system.

I further certify that a copy of the foregoing and accompanying memorandum and attachments will be deposited with the U.S. Postal Service, for delivery to the below

Defendants by certified mail:

U.S. Department of Justice
950 Pennsylvania Avenue NW
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Attorney General Pamela J. Bondi
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/s/ Brian Netter

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