

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

THE CORPORATION FOR PUBLIC)
BROADCASTING, *et al.*)

Plaintiffs,)

v.)

Case No. 2025-cv-1305

DONALD J. TRUMP, in his Official)
Capacity as President of the United)
States of America, *et al.*)

Defendants.)

**PLAINTIFFS THE CORPORATION FOR PUBLIC BROADCASTING, THE
BOARD OF DIRECTORS FOR THE CORPORATION FOR PUBLIC
BROADCASTING, LAURA G. ROSS, THOMAS E. ROTHMAN, AND DIANE
KAPLAN’S MOTION FOR A TEMPORARY RESTRAINING ORDER**

Pursuant to Local Civil Rule 65.1(a), Plaintiffs the Corporation for Public Broadcasting (“CPB”), its Board of Directors, and Laura G. Ross, Thomas E. Rothman, and Diane Kaplan hereby move for a temporary restraining order enjoining Defendants Donald J. Trump, Trent Morse, the United States Office of Management and Budget, Russell Vought, the White House Presidential Personnel Office, and Sergio Gor from taking any action which gives effect to the email purporting to terminate three members of the Board of Directors for CPB (the “Correspondence”) or otherwise seeks to interfere with or control the governance and operations of the CPB.

As set forth in more detail in the accompanying brief, the Correspondence violates the Constitution, and the Administrative Procedure Act.

Pursuant to Local Civil Rule 65.1(a), at 11:30 p.m. on April 28, 2025, counsel for Plaintiffs emailed the three Assistant Directors for the Federal Programs Branch of the Department of Justice to provide them with electronic copies of the complaint, this motion for a temporary restraining order, the accompanying memorandum, the Declaration of Evan Slavitt, and a proposed order.

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