

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

AMERICAN LIBRARY ASSOCIATION,
225 N. Michigan Ave.
Suite 1300
Chicago, Illinois 60601,

AMERICAN FEDERATION OF STATE,
COUNTY AND MUNICIPAL
EMPLOYEES, AFL-CIO,
1625 L Street NW
Washington, DC 20036,

Plaintiffs,

v.

KEITH SONDERLING, in his capacity as
Acting Director of the Institute of Museum
and Library Services,
955 L'Enfant Plaza North, SW,
Suite 4000
Washington, DC 20024,

INSTITUTE OF MUSEUM AND
LIBRARY SERVICES,
955 L'Enfant Plaza North, SW,
Washington, DC 20024,

DONALD TRUMP, in his capacity as
President of the United States of America,
1600 Pennsylvania Avenue NW,
Washington, DC 20050,

AMY GLEASON, in her capacity as Acting
Administrator of the U.S. DOGE Service
and U.S. DOGE Service Temporary
Organization,
736 Jackson Place NW
Washington, DC 20503,

U.S. DOGE SERVICE,
736 Jackson Place NW
Washington, DC 20503,

Case No. 1:25-cv-01050

U.S. DOGE SERVICE TEMPORARY
ORGANIZATION,
736 Jackson Place NW
Washington, DC 20503,

RUSSELL VOUGHT, in his capacity as
Director of the Office of Management and
Budget,
725 17th Street NW, Suite 9272
Washington, DC 20503, and

U.S. OFFICE OF MANAGEMENT AND
BUDGET,
725 17th Street NW, Suite 9272
Washington, DC 20503,

Defendants.

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Local Civil Rule 65.1(a), Plaintiffs American Library Association and American Federation of State, County, and Municipal Employees, AFL-CIO hereby move for a preliminary injunction directing Defendants immediately to cease actions to dissolve the Institute of Museum and Library Services (IMLS) until the Court can further consider the merits of Plaintiffs’ claims. Pursuant to Local Civil Rule 65.1(d), Plaintiffs request the Court hold a hearing on Plaintiffs’ motion for a preliminary injunction within 21 days due to the exigencies of Defendants’ ongoing dismantling of IMLS, and in particular, their reported plan to fire all IMLS staff as of May 4. Plaintiffs refer the Court to the facts set forth in the memorandum accompanying this motion, pages 5–8 and 28–36, and supporting declarations.

Plaintiffs further request that the Court issue the preliminary injunction before May 4, 2025, the date on which the Defendants’ mass termination of IMLS staff will reportedly take effect. *See* PI Mem. at 7, 18. Plaintiffs further request that the Court order Defendants to file a status

report within twenty-four hours of the issuance of any preliminary injunction, and at regular intervals thereafter, confirming compliance with the Court's order.

As described in the accompanying memorandum, Defendants' actions violate the Constitution's principle of separation of powers and Take Care Clause. Defendants also violate the Administrative Procedure Act because their actions to dismantle the IMLS are final agency actions in excess of Defendants' statutory authority and are arbitrary and capricious. Defendants' violations cause ongoing and irreparable harm to Plaintiffs, which will worsen without immediate relief.

Plaintiffs filed their complaint in this matter on April 7, 2025. On April 9, 2025, counsel for Plaintiffs emailed the three Assistant Directors for the Federal Programs Branch of the Department of Justice to provide actual notice of the complaint and Plaintiffs' plan to file the instant motion on April 10; counsel for Defendants indicated that Defendants will oppose this motion. Defendants entered an appearance on April 10, 2025.

Dated: April 10, 2025

/s/ Rachel L. Fried

Rachel L. Fried (DC Bar No. 1029538)

Orlando Economos (DC Bar No.
90013791)

Kayla M. Kaufman (DC Bar No.
90029091)

Robin F. Thurston (DC Bar No. 1531399)

Skye Perryman (DC Bar No. 984573)

Democracy Forward Foundation

P.O. Box 34553

Washington, DC 20043

(202) 448-9090

rfried@democracyforward.org

oeconomos@democracyforward.org

kkaufman@democracyforward.org

rthurston@democracyforward.org

sperryman@democracyforward.org

/s/ Chris Gair

Chris Gair (Ill. Bar No. 6190781)*

Vilia Dedinas (Ill. Bar No. 6191614)*

John Gallo (Ill. Bar No. 6193988)*

Ingrid Yin (Ill. Bar No. 6339857)*

Gair Gallo Eberhard LLP

1 E. Wacker Drive, Suite 2600

Chicago, Illinois 60601

(312) 600-4900

cgair@gairgallo.com

vdedinas@gairgallo.com

jgallo@gairgallo.com

iyin@gairgallo.com

Counsel for Plaintiffs

**Pro hac vice application pending*