## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

SIERRA CLUB, et al.

Plaintiffs,

v.

Civil Action No. 25-cv-1112-RC

ENVIRONMENTAL PROTECTION AGENCY, et al.

Defendants.

## PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs respectfully request that this Court grant a preliminary injunction on their claims that Defendants' actions violate the Administrative Procedure Act. In support of this motion, Plaintiffs submit the accompanying memorandum of law, declarations of Patrick Grenter, Pallavi Phartiyal, Jennifer Duggan, and Jane Williams, and a proposed order.

Dated: May 16, 2025 Respectfully submitted,

/s/ Zachary R. Shelley
Zachary R. Shelley (DC Bar No. 90021549)
Adina H. Rosenbaum (DC Bar No. 490928)
Allison M. Zieve (DC Bar No. 424786)
Public Citizen Litigation Group
1600 20th Street NW
Washington, DC 20009
(202) 588-1000
zshelley@citizen.org

Counsel for All Plaintiffs

Andrea Issod\* (CA Bar No. 230920) Joya Manjur\* (CA Bar No. 348160) Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5544

Counsel for Sierra Club

\* Motion to appear pro hac vice filed