

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

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AMERICAN FOREIGN SERVICE  
ASSOCIATION,

*Plaintiff,*

v.

DONALD TRUMP, et al.,

*Defendants.*

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Civil Action No. 25-cv-1030-PLF

**PLAINTIFF AMERICAN FOREIGN SERVICE ASSOCIATION’S  
MOTION FOR A PRELIMINARY INJUNCTION**

Pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1, Plaintiff American Foreign Service Association (“AFSA”), a labor union that represents nearly 18,000 Foreign Service employees, submits this motion for preliminary injunctive relief. AFSA respectfully requests a hearing on the motion on Monday, May 5, 2025.

Defendant Donald J. Trump issued Executive Order No. 14251 on March 27, 2025 that deprives an overwhelming majority of Foreign Service employees of their rights to organize and bargain collectively. Defendant Charles Ezell, the acting Director of the Office of Personnel Management, issued a Guidance Memorandum to Heads and Acting Heads of Agencies advising them on how to implement the Executive Order by withdrawing recognition from the employees’ exclusive bargaining representatives, terminating existing collective bargaining agreements and taking other actions to undermine the employee’s representatives, like AFSA. Defendants U.S. Department of State (“State”) and U.S. Agency of International Development (“USAID”), along with Defendant Marco Rubio, the Secretary of State and Acting Administrator of USAID, have

taken steps to implement the Executive Order pursuant to the OPM Guidance. This unlawful conduct threatens to eliminate the rights to organize and bargain collectively, not because of any legitimate “national security” issues, but to retaliate against unions, like AFSA, for their efforts to represent these employees. Foreign Service employees have lost the ability to bargain collectively at a time when it matters the most, as the Administration continues to make significant, ongoing changes to employees’ working conditions and employment. This lost ability and opportunity to bargain results in harms to those employees and AFSA that are immeasurable and that will become irreparable absent emergency relief.

For these reasons, along with those in the accompanying Memorandum in Support, AFSA respectfully requests this Court to enjoin the application and enforcement of Sections 1(b), 3 and 6 of Executive Order No. 14251 and OPM’s Guidance on implementing the Executive Order as set forth in the proposed Order.

DATED: April 14, 2025

Respectfully submitted,

By: /s/ Richard J. Hirn  
 Richard J. Hirn  
 D.C. Bar No. 291849  
 5335 Wisconsin Ave., NW, Suite 440  
 Washington, D.C. 20015  
 (202) 274-1812  
[richard@hirnlaw.com](mailto:richard@hirnlaw.com)

Keith R. Bolek  
 Bar No. 463129  
 April H. Pullium  
 Bar No. 198026  
 O’Donoghue & O’Donoghue LLP  
 5301 Wisconsin Avenue, Suite 800  
 Washington, D.C. 20015  
 (202) 362-0041  
[kbolek@odonoghuelaw.com](mailto:kbolek@odonoghuelaw.com)  
[apullium@odonoghuelaw.com](mailto:apullium@odonoghuelaw.com)

Sharon L. Papp\*  
General Counsel  
D.C. Bar No. 107992  
Raeka Safai\*  
Deputy General Counsel  
D.C. Bar No. 977301  
American Foreign Service Association  
2101 E Street, NW  
Washington, DC 20037  
(202) 338-4045  
[papp@afsa.org](mailto:papp@afsa.org)  
[safai@afsa.org](mailto:safai@afsa.org)

\*D.D.C. Application Pending

*Counsel for Plaintiff American Foreign  
Service Association*