

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

MARY BOYLE, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United
States, et al.,

Defendants.

Civil Action No. 8:25-cv-1628-MJM

**PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER AND
PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Mary Boyle, Alexander Hoehn-Saric, and Richard Trumka Jr. respectfully move this Court for a temporary restraining order (TRO) enjoining Defendants Scott Bessent, Russell Vought, and Peter A. Feldman from taking any action to effectuate President Donald J. Trump's purported termination of Plaintiffs from their roles as Commissioners of the Consumer Product Safety Commission (CPSC), including by barring Plaintiffs' access to the agency resources (including, but not limited to, Plaintiffs' office spaces, CPSC telephone and computer equipment, CPSC email accounts, and physical and electronic files) to which Plaintiffs had access prior to May 8, 2025; giving effect to the purported termination of Plaintiffs' staff members; or withholding from Plaintiffs and their staff members the pay and benefits that they were entitled to receive in connection with their roles at the CPSC prior to May 8, 2025. As set forth in greater detail in the accompanying memorandum of law, President Trump's termination of Plaintiffs was ultra vires and contrary to the Consumer Product Safety Act, and Plaintiffs will suffer irreparable harm absent injunctive relief.

Plaintiffs further move this Court to convert the requested TRO into a preliminary injunction after it has received briefing and argument from the parties.

Counsel for Plaintiffs attest that, within twenty minutes after filing the complaint in this matter, they emailed the three Directors for the Federal Programs Branch of the Department of Justice and the Chief of the Civil Division of the U.S. Attorney's Office for the District of Maryland to provide actual notice that they had filed a complaint in this matter (attaching a copy of the complaint) and that they would be filing the instant motion the same day. Immediately prior to filing this motion, counsel for Plaintiffs, by email, provided the three Directors for the Federal Programs Branch of the Department of Justice and the Chief of the Civil Division of the U.S. Attorney's Office for the District of Maryland with electronic copies of this motion and accompanying memorandum, declarations (with exhibits), and proposed order.

Dated: May 21, 2025

Respectfully submitted,

/s/ Stephanie Garlock

Stephanie Garlock

(D. Md. Bar No. 31594)

Nicolas A. Sansone

(*pro hac vice* application pending)

Allison M. Zieve

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