

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

VERA INSTITUTE OF JUSTICE, et al.,
*Plaintiffs, on behalf of themselves and all others similarly
situated,*

v.

UNITED STATES DEPARTMENT
OF JUSTICE,

PAMELA J. BONDI, in her official capacity as
United States Attorney General,

OFFICE OF JUSTICE PROGRAMS,

MAUREEN A. HENNEBERG, in her official
capacity as Acting Head of the Office of Justice
Programs,

Defendants.

Case No. 1:25-cv-1643

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Plaintiffs Vera Institute of Justice, Children and Youth Justice Center d/b/a Center for Children & Youth Justice, Chinese for Affirmative Action d/b/a Stop AAPI Hate, FORCE Detroit, Health Resources in Action, and Vera Institute of Justice respectfully move pursuant to Federal Rule of Civil Procedure 65 for a preliminary injunction. For the reasons presented in the accompanying memorandum in support of this motion, the Court should enter an order that enjoins Defendants from implementing their decision in April 2025 to terminate grants issued by the U.S. Department of Justice Office of Justice Programs. The specific contours of the relief that Plaintiffs seek are provided in the accompanying proposed order.

Dated: May 22, 2025

Respectfully submitted,

LISA NEWMAN*

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**Pro hac vice* motion pending

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*Request for admission pending