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

SUSMAN GODFREY LLP,

Plaintiff,

No. 1:25-cv-1107

v.

EMERGENCY HEARING RESPECTFULLY REQUESTED

EXECUTIVE OFFICE OF THE PRESIDENT, et al.,

Defendants.

## PLAINTIFF SUSMAN GODFREY LLP'S MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1, Plaintiff Susman Godfrey LLP, by undersigned counsel, respectfully moves for the immediate issuance of a temporary restraining order (TRO) enjoining Defendants from enforcing or implementing the provisions of Sections 1, 3, and 5 of the President's April 9, 2025 Executive Order entitled "Addressing Risks from Susman Godfrey." Plaintiff respectfully requests a hearing on this motion tomorrow. Undersigned counsel is available to participate in such a hearing at any time. Emergency relief is necessary due to the exigency of the circumstances created by the Executive Order and the irreparable injuries that the requested temporary restraining order is intended to prevent. Plaintiff respectfully requests that the Court dispense with the security referenced in Federal Rule of Civil Procedure 65(c), for the reasons stated in its memorandum in support of this motion.

The grounds for this motion are set forth in the attached memorandum of law and its supporting declarations and exhibits. A proposed order and a certification of compliance with Local Civil Rule 65.1 are also attached.

Dated: April 14, 2025 Respectfully submitted,

## /s/ Donald B. Verrilli, Jr.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2025, I filed the foregoing document with the Clerk of Court for the United States District Court for the District of Columbia using the court's CM/ECF filing.

I further certify that a copy of the foregoing will be deposited with the United States Postal Service, for delivery to the below Defendants and to the Department of Justice by Certified Mail:

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