

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

AMERICAN EDUCATIONAL RESEARCH
ASSOCIATION, *et al.*,

Plaintiffs,

vs.

U.S. DEPARTMENT OF EDUCATION,
et al.,

Defendants.

Civil Action No. 8:25-cv-01230

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs American Educational Research Association and Society for Research on Educational Effectiveness (together, “Plaintiffs”), on behalf of their members, hereby move for a preliminary injunction to redress Defendants’ recent actions: Defendants’ cancellation of \$1.2 billion in contracts *en masse*, abruptly halting vital research studies and agency support services (“the Research Termination Action”) and Defendants’ reduction in force (“RIF”) that designated nearly 90 percent of IES staff for termination (“the IES Staff Termination Action”).

As explained in the memorandum of law accompanying this motion, Plaintiffs’ members are education researchers whose work has been gravely harmed by IES’s failure to carry out its functions and to, as required by law, disseminate timely, relevant, high-quality data and research to researchers. Plaintiffs’ members stand to suffer further irreparable harm without preliminary relief. The requested relief is necessary to restore the status quo.

Specifically, Plaintiffs respectfully seek a preliminary injunction requiring:

1. That Defendants reverse the Institute of Education Sciences (“IES”) Mass Termination Action, as defined and described in the accompanying memorandum, by revoking the reduction in force (“RIF”) notices sent to IES employees and by removing them from administrative leave and placing them back in their roles to carry out IES functions;
2. That Defendants promptly reinstate all contracts terminated in the Research Termination Action, as defined and described in the accompanying memorandum.
3. That Defendants take prompt action to preserve from destruction all data collected in the course of the conducting research studies cancelled in the Research Termination Action.

Dated: April 29, 2025

Respectfully submitted,
/s/ Daniel A. McGrath
Daniel A. McGrath (Bar No. 31501)
Madeline H. Gitomer (Bar No. 31518)
Emma R. Leibowitz (Bar No. 31568)
Victoria S. Nugent (Bar No. 15039)
Democracy Forward Foundation
P.O. Box 34553
Washington, DC 20043
(202) 448-9090
dmcgrath@democracyforward.org
mgitomer@democracyforward.org
eleibowitz@democracyforward.org
vnugent@democracyforward.org
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Daniel A. McGrath, certify that I filed the foregoing with the Clerk of Court for the United States District Court for the District of Maryland by using the CM/ECF system, which sent a notice of such filing to all registered CM/ECF users who have appeared in this case. I also emailed a copy of the motion and its attachments to counsel at the Department of Justice.

/s/ Daniel A. McGrath
Daniel A. McGrath
Counsel for Plaintiffs