

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

-against-

KARI LAKE, et al.,

Defendants.

No. 25 Civ. 2390

**ORDER TO SHOW CAUSE WITH TEMPORARY RESTRAINING ORDER**

Upon reading the Declaration of Andrew G. Celli, Jr., dated March 23, 2025, and exhibits annexed thereto; the Complaint dated March 21, 2025; and the Memorandum of Law in Support of Plaintiffs' Motion for a Preliminary Injunction and a Temporary Restraining Order, dated March 23, 2025; and all pleadings and proceedings relevant to this action, and good and sufficient cause therefor, it is hereby:

ORDERED that Defendants \_\_\_\_\_ show cause before this Court in Room \_\_\_\_\_, \_\_\_\_\_, New York, New York on \_\_\_\_\_, 2025 at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon, or as soon thereafter as counsel can be heard, why an order should not be issued, pursuant to Federal Rule of Civil Procedure 65:

- (A) Preliminarily enjoining Defendants, pending further order of this Court, to take all necessary steps to return USAGM and its employees, contractors, and grantees to their status prior to the March 14, 2025 Executive Order entitled "Continuing the Reduction of the Federal Bureaucracy" and the March 15, 2025 email issued to all

VOA staff (“March 14, 2025 and March 15, 2025 Actions”), including by permitting employees or contractors that were placed on leave, or had their contracts changed, canceled or modified on or after March 14, 2025, to return to work (whether employees or Personal Services Contractors); and

- (B) Preliminarily enjoining Defendants, pending further order of this Court, to comply with Congressional statutes that require VOA to “serve as a consistently reliable and authoritative source of news,” 22 U.S.C.A. § 6202(c), and require international USAGM outlets to “provide news which is consistently reliable and authoritative, accurate, objective, and comprehensive,” 22 U.S.C. § 6202(a), (b) (and, similarly, 22 U.S.C. § 1456a), including by: (i) enjoining Defendants, and those acting in concert with them, from taking take any steps that would cause USAGM or its outlets to be unable to effectively disseminate news and opinion to a significant audience, including by taking any USAGM outlet off the air, (ii) directing that Defendants restore all programming in effect as of March 13, 2025 on USAGM and USAGM-grantee media outlets; and (iii) directing that Defendants shall continue to make and supervise grants and allocate funds for international broadcasting to Radio Free Europe/Radio Liberty, Radio Free Asia, Radio Free Afghanistan and the Open Technology Fund; and
- (C) Preliminarily enjoining Defendants, pending further order of this Court, from taking any action to reduce USAGM’s workforce (whether employees or Personal Services Contractors, PSCs, or grantees) whether by leave, furloughs, termination, reduction-in-force, cancelation of grants or contracts, or otherwise on the basis of

USAGM's or its grantee networks' speech that is protected by the First Amendment.

FURTHER ORDERED, that pending the hearing and determination of Plaintiffs' motion for a preliminary injunction, Defendants, and those acting in concert with them, are temporarily enjoined:

- (A) from taking any further actions to implement or effectuate the March 14, 2025 and March 15, 2025 Actions as to USAGM, or take any action to reduce USAGM's workforce (whether employees, contractors, or grantees), included but not limited to (i) proceeding with any further attempt to terminate, reduce-in-force, place on leave, or furlough any USAGM employee, or contractor, (ii) terminating (or proceeding with terminating as announced) any USAGM grant or contract or proceeding with terminating any USAGM Personal Services Contractors (PSCs) who received notice after March 14, 2025 that their contract would be terminated, including but not limited to John Doe 3 and John Doe 4 who received notice that their contracts would be terminated on March 31, 2025, or (iii) closing any USAGM office or requiring employees or contractors in overseas offices to return to the United States.

FURTHER ORDERED that the bond requirement of Federal Rule of Civil Procedure 65(c) is waived;

FURTHER ORDERED, that a copy of this Order to Show Cause together with the papers upon which it is based, and the Summons and Complaint, be served on or before March \_\_\_, 2025 upon the Defendants by hand delivery to the United States Attorney for the Southern District of New York and the Attorney General of the United States at Washington, D.C. and by overnight mail to each Defendant at the Washington, D.C. offices of USAGM, which shall be deemed good and sufficient service;

FURTHER ORDERED that service of opposition papers, if any, be made on or before the \_\_\_ day of \_\_\_, 2025 by electronic filing on ECF; and

FURTHER ORDERED that service of reply papers, if any, be made on or before the \_\_\_ day of \_\_\_, 2025 by electronic filing on ECF.

SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_

U.S.D.J.