

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

PROTECT DEMOCRACY PROJECT,

Plaintiff,

v.

U.S. OFFICE OF MANAGEMENT & BUDGET
et al.,

Defendants.

Case No. 1:25-cv-01111

**PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION OR IN THE
ALTERNATIVE PARTIAL SUMMARY JUDGMENT**

For the reasons stated in the attached Memorandum of Law, Plaintiff Protect Democracy Project hereby moves for a preliminary injunction under Federal Rule of Civil Procedure 65(a) on its claim at Count One of the Complaint that Defendants' actions are contrary to law because they violate the plain terms of the 2022 and 2023 Appropriations Acts. *See* 7 U.S.C. § 706(2). Plaintiff alternatively moves for partial summary judgment under Federal Rule of Civil Procedure 56 on this same claim, because it raises pure issues of law.

Dated: April 27, 2025

/s/ Daniel F. Jacobson

Daniel F. Jacobson (D.C. Bar # 1016621)

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Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2025, I served the foregoing Motion for a Preliminary Injunction or in the Alternative Partial Summary Judgment, and all supporting documents, on Defendants' counsel via the Court's ECF filing system.

/s/ Daniel F. Jacobson
Daniel F. Jacobson