

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SHIRA PERLMUTTER,

Plaintiff,

v.

TODD BLANCHE *et al.*,

Defendants.

Case No. 25-cv-01659-TJK

**PLAINTIFF SHIRA PERLMUTTER'S MOTION
FOR A PRELIMINARY INJUNCTION**

Pursuant to Rule 65(a) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1, Plaintiff Shira Perlmutter, by undersigned counsel, respectfully moves for a preliminary injunction enjoining Defendants from unlawfully attempting to remove Ms. Perlmutter from her position as Register of Copyrights and Director of the U.S. Copyright Office. The precise contours of the order that Plaintiff seeks are provided in the proposed order attached to this Motion. Preliminary relief is necessary due to the exigency of the circumstances created by Defendants' unlawful conduct and the irreparable injuries that the requested preliminary injunction is intended to prevent.

The grounds for this Motion are set forth in the attached memorandum of law and its supporting declaration. A proposed order is attached.

Dated: June 10, 2025

Respectfully submitted,

/s/ Allyson R. Scher

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Allyson R. Scher (D.C. Bar No. 1616379)

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