

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, et al.,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment of the Humanities, et al.,

Defendants.

Case No. 1:25-cv-03657

NOTICE OF MOTION FOR A PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law and supporting declarations and exhibits, and complaint in this action, the undersigned, on behalf of Plaintiffs American Council of Learned Societies, American Historical Association, and Modern Language Association, hereby move this Court for an order granting a preliminary injunction, pursuant to Rule 65 of the Federal Rules of Civil Procedure enjoining Defendants from (1) enforcing their decisions to eliminate or nearly eliminate National Endowment for the Humanities (“NEH”) divisions, programs, and offices; mass-terminate staff; delay spending or fail to spend appropriated funds; (2) enforcing and giving effect to the termination of Plaintiffs’ grants and the grants of their members; and (3) to obligate and spend funds appropriated to NEH by Congress without intentional delay.

Dated: May 14, 2025

Respectfully submitted,

/s/ John Robinson
Daniel F. Jacobson⁺
Lynn D. Eisenberg*
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⁺ Pro hac vice motion forthcoming
** Of Counsel*

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