

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

RFE/RL, INC.,

Plaintiff,

v.

KARI LAKE, in her official capacity as Senior
Advisor to the Acting CEO of the United
States Agency for Global Media;

VICTOR MORALES, in his official capacity as
acting Chief Executive Officer of the United
States Agency for Global Media; and

UNITED STATES AGENCY FOR GLOBAL
MEDIA,

Defendants.

Case No. 1:25-cv-799-RCL

**PLAINTIFF’S MOTION FOR
A FURTHER TEMPORARY RESTRAINING ORDER**

Plaintiff RFE/RL, Inc. (“RFE/RL”), respectfully moves pursuant to Federal Rule of Civil Procedure 65 for a further temporary restraining order. For the reasons presented in the memorandum in support of this motion, the Court should enter an order requiring Defendant U.S. Agency for Global Media (“USAGM”) to immediately disburse to RFE/RL the amount of RFE/RL’s congressionally appropriated funds for the period from May 1, 2025, through May 31, 2025, *i.e.*, \$12,174,979, under the same terms and conditions that were previously in effect and governed the funds disbursed in April 2025. The specific relief that RFE/RL seeks is provided in the proposed temporary restraining order attached to this motion.

May 20, 2025

Respectfully submitted,

/s/ Marney L. Cheek

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CERTIFICATE OF SERVICE

Pursuant to Local Rule 65.1(a), I hereby certify that on May 20, 2025, I filed the foregoing document and all attachments with the Clerk of Court for the United States District Court for the District of Columbia using the court's CM/ECF filing system, which will send notification of such filing via e-mail to all counsel of record.

Respectfully submitted,

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