

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

<hr/> NATIONAL PUBLIC RADIO, INC., <i>et al.</i> <i>Plaintiffs,</i> v. DONALD J. TRUMP, <i>et al.</i> <i>Defendants.</i>	<hr/> Case No. 25-cv-1674
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**PLAINTIFFS’ MOTION FOR SUMMARY JUDGMENT
AND DECLARATORY AND PERMANENT INJUNCTIVE RELIEF**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Civil Rule 7(h), Plaintiff National Public Radio, Inc. (NPR) and Plaintiffs Roaring Fork Public Radio, Inc. d/b/a Aspen Public Radio (Aspen Public Radio), Colorado Public Radio (CPR), and KUTE Inc. d/b/a KSUT Public Radio (KSUT) (together, the Local Member Stations), by and through their undersigned counsel, respectfully move for summary judgment in their favor against all Defendants. Specifically, Plaintiffs respectfully request that this Court declare Executive Order 14290, entitled “Ending Taxpayer Subsidization of Biased Media” and issued by the President on May 1, 2025, unlawful because it violates the First and Fifth Amendments to the U.S. Constitution, exceeds the limits that Congress imposed on the Executive Branch in the Public Broadcasting Act and National Foundation on the Arts and Humanities Act, and contravenes the Constitution’s separation of powers. Because the Order is unlawful, Plaintiffs respectfully request that the Court declare that all actions by Defendants implementing it also are unlawful—and the National Endowment for the Arts and the Corporation for Public Broadcasting may not lawfully withhold funding from any Plaintiff on the basis of the Order. And because the Order inflicts serious and

irreparable injuries on Plaintiffs for which there is no adequate remedy at law and injunctive relief would serve the public interest, Plaintiffs further respectfully request that this Court permanently enjoin all Defendants, save Defendant President Donald J. Trump, from implementing or enforcing it.

The grounds for this Motion are fully set forth in the attached Memorandum of Law and supporting declarations and exhibits. A proposed order describing with more particularity the relief sought also is attached. Consistent with the briefing schedule entered by the Court on June 10, 2025, Plaintiffs respectfully request a hearing on this Motion as soon as practicable following the competition of briefing on August 8, 2025.

June 13, 2025

Respectfully submitted,

/s/ Miguel A. Estrada

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CERTIFICATE OF SERVICE

I hereby certify that on June 13, 2025, I electronically filed the foregoing Motion and all supporting documents with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system, which will serve a copy of the same on the counsel of record.

Respectfully submitted,

/s/ Miguel A. Estrada