

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

GLOBAL HEALTH COUNCIL, *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, *et al.*,

*Defendants.*

Civil Action No. 25-cv-402 (AHA)

**GLOBAL HEALTH COUNCIL PLAINTIFFS’  
MOTION TO ENFORCE PRELIMINARY INJUNCTION**

For the reasons provided in the attached memorandum of law, Plaintiffs hereby move to enforce the Court’s preliminary injunction, ECF No. 60. As explained in the accompanying memorandum of law, Plaintiffs respectfully request that the Court enforce the preliminary injunction by: (1) confirming that Defendants must obligate all of the expiring foreign assistance appropriations in accordance with Congress’ specific directives for how the funds must be spent; (2) requiring Defendants to submit a detailed plan for compliance; (3) ordering Defendants to immediately start all steps necessary to obligate expiring funds; (4) making clear that Defendants may not leverage their ongoing noncompliance to impound funds through a “pocket rescission” or other strategy; (5) explaining that the Court will, if necessary as a last resort, extend the period of availability for expiring funds to prevent them from being impounded; and (6) prohibiting Defendants from effectuating terminations issued prior to February 13 without the consent of the awardee. A proposed order is attached.

Dated: June 24, 2025

Respectfully submitted,

/s/ Daniel F. Jacobson

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