

Anna Sortun, OSB No. 045279
Direct: 503.802.2107
Email: anna.sortun@tonkon.com
Steven M. Wilker, OSB No. 911882
Direct: 503.802.2040
Email: steven.wilker@tonkon.com
Paul Balmer, OSB No. 203429
Direct: 503.802.5745
Email: paul.balmer@tonkon.com
Gracey Nagle, OSB No. 215255
Direct: 503.802.5753
Email: gracey.nagle@tonkon.com
Tonkon Torp LLP
1300 SW Fifth Ave., Suite 2400
Portland, OR 97201
Facsimile: 503.274.8779
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

OREGON COUNCIL FOR THE
HUMANITIES d/b/a OREGON
HUMANITIES, a nonprofit corporation;
FEDERATION OF STATE HUMANITIES
COUNCILS, a nonprofit corporation,

Plaintiffs,

v.

UNITED STATES DOGE SERVICE, a
component of the Executive Office of the
President; AMY GLEASON, in her official
capacity as Acting Administrator of the
United States DOGE Service; NATIONAL
ENDOWMENT FOR THE HUMANITIES,
an independent federal agency, and its
advisory council NATIONAL COUNCIL ON
THE HUMANITIES; MICHAEL
MCDONALD, in his official capacity as
Acting Chairman of the National Endowment
for the Humanities,

Defendants.

Civil No. 3:25-cv-00829-SI

**PLAINTIFFS' MOTION FOR A 5 U.S.C.
§ 705 STAY AND PRELIMINARY
INJUNCTION**

Oral Argument Requested

For reasons explained in the accompanying memorandum of law, supporting declarations¹ and exhibits, and the Amended Complaint in this action, Plaintiffs Oregon Council for the Humanities and Federation of State Humanities Councils move for an order entering a stay under section 705 of the Administrative Procedure Act (APA), 5 U.S.C. § 705, and a preliminary injunction against all Defendants:

1. Enjoining, pending further order of the Court, Defendants, their agents, and anyone acting at Defendants' direction to restore the Federal State Partnership by returning NEH grants to state and jurisdictional humanities councils to the status quo prior to the termination and rescission decisions.

2. Requiring Defendants to file, within one week of entry of this order and every month thereafter until resolution of the merits, a Status Report documenting the actions that they have taken to comply with the Court's order.

DATED: June 25, 2025.

TONKON TORP LLP

By: /s/ Anna Sortun
Anna Sortun, OSB No. 045279
Direct: 503.802.2107
Email: anna.sortun@tonkon.com
Steven M. Wilker, OSB No. 911882
Direct: 503.802.2040
Email: steven.wilker@tonkon.com
Paul Balmer, OSB No. 203429
Direct: 503.802.5745
Email: paul.balmer@tonkon.com
Gracey Nagle, OSB No. 215255
Direct: 503.802.5753
Email: gracey.nagle@tonkon.com
Attorneys for Plaintiffs

¹ Attached as an Appendix to this Motion is a table listing the names, titles, and affiliations of the twelve individuals who provided supporting declarations accompanying the Motion.

TABLE OF DECLARATIONS

| Name | Title | Affiliation |
|-----------------------|-------------------------|---|
| Asmo, Rebecca | Executive Director | Ohio Humanities Council |
| Best, Jama | Executive Director | Arkansas Humanities Council |
| Davis, Adam | Executive Director | Oregon Council of Humanities |
| Doe, Jane | Former or Current Staff | National Endowment of Humanities |
| Doe, Mary | Former or Current Staff | National Endowment of Humanities |
| Johnson, Brandon | Executive Director | New Mexico Humanities Council |
| Lyon, Gabrielle | Executive Director | Illinois Humanities |
| Oey, Christina | Executive Director | South Dakota Humanities Council |
| Perez-Verdia, Kameron | President and CEO | Alaska Humanities Forum |
| Rockoff, Stuart | Executive Director | Mississippi Humanities Council |
| Sortun, Anna | Attorney | Tonkon Torp LLP |
| Stein, Phoebe | President | Federation of State Humanities Councils |