

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN FEDERATION OF
LABOR AND CONGRESS OF
INDUSTRIAL ORGANIZATIONS,
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Civil Action No. 1:25-cv-02445-PLF

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

For the reasons set forth in Plaintiffs' Memorandum in Support of Plaintiffs' Motion for a Preliminary Injunction and accompanying declarations and exhibits, Plaintiffs move this Court, pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1, to enter a preliminary injunction enjoining the Defendants other than Donald J. Trump from implementing or otherwise giving effect to Section 2 of Executive Order No. 14,251, Exclusions from Federal Labor-Management Programs, 90 Fed. Reg. 14,553 (March 27, 2025) ("EO 14,251"), and the Office of Personnel Management's Guidance on Executive Order Exclusions from Federal Labor-Management Programs (Mar. 27, 2025), with respect to Plaintiffs' bargaining units and all employees in the Plaintiffs' bargaining units. Plaintiffs further request all other appropriate relief necessary for the effectiveness of such preliminary injunction. Plaintiffs also request that the preliminary injunction direct Plaintiffs to post with the Court \$100 as security.

For purposes of this motion, Plaintiffs' bargaining units are as follows:

1) the Environmental Protection Agency bargaining unit represented by Plaintiff International Federation of Professional & Technical Engineers ("IFPTE"), Local 20;

2) the Department of Defense bargaining units represented by: a) IFPTE Locals 1, 3, 4, 7, 8A, 12, 16, 22, 32, 49, 86, 96, 97, 98, 121, 131, 259, 561, 777, 852, and 1437; b) Plaintiff American Federation of Teachers’ Overseas Federation of Teachers; c) Plaintiff Metal Trades Department’s metal trades councils; d) Plaintiff International Organization of Masters, Mates & Pilots; e) Plaintiff District No. 1, Pacific Coast District, Marine Engineers’ Beneficial Association; f) Plaintiff United Association of Journeymen and Apprentices of the Plumbing and Pipefitting Industry, Local 100; g) Plaintiffs International Brotherhood of Electrical Workers, Local Unions 26, 1688, 2080, and 2219; and h) Plaintiff International Association of Machinists and Aerospace Workers, AFL-CIO (“IAM”) Locals 97, 174, 225, 282, 726, 1859, 1998, 2049, 2296, 2297, 2424, 2783, and 2902.

3) the U.S. Coast Guard (Department of Homeland Security) bargaining units represented by a) Plaintiff Metal Trades Department’s metal trades councils; and b) IAM Local 2203.

4) the Department of Energy bargaining unit represented by Plaintiff Office and Professional Employees International Union’s Local 2001.

Dated: August 22, 2025

Respectfully submitted,

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** Pro hac vice motion to be filed

*** Pro hac vice motion pending