

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

AMERICAN FEDERATION OF STATE
COUNTY AND MUNICIPAL EMPLOYEES,
AFL-CIO *et al.*

Plaintiffs,

V.

DONALD J. TRUMP *et al.*

Defendants.

Case No. 1:25-cv-03306

**HEARING REQUESTED
BY OCTOBER 20**

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME”); American Federation of Government Employees, AFL-CIO (“AFGE”); Voice of America Employees Union, Local 1418, District Council 20, American Federation of State, County and Municipal Employees, AFL-CIO (“AFSCME Local 1418”); and American Federation of Government Employees, Local 1812 (“AFGE Local 1812”) submit this motion for preliminary injunctive relief. In light of the irreparable harm faced by Plaintiffs and their members, including Defendants’ refusal to recognize their statutory labor rights, the termination of their collective bargaining agreements, and the ongoing chilling effect on First Amendment speech, all in the face of an impending large-scale reduction-in-force and deadlines to challenge the same, Plaintiffs respectfully request a hearing on this motion by October 20.

On August 28, 2025, President Trump issued Executive Order 14343, entitled *Further Exclusions from the Federal Labor-Management Relations Program*, 90 Fed. Reg. 42683 (Aug. 28, 2025) (“Further Exclusion Order”). In the Further Exclusion Order, the President declared that

pursuant to his authority under 5 U.S.C. § 7103(b), USAGM and its employees were no longer covered by the federal labor-management relations framework contained in Chapter 71 of Title 5 of the U.S. Code. The next day, USAGM notified Plaintiffs that it was terminating their collective bargaining agreements and then issued specific notices for an upcoming reduction in force, to take effect for most employees on September 30, 2025.

As set forth in Plaintiffs' Memorandum of Points and Authorities in Support of Their Motion for a Preliminary Injunction and the accompanying declarations and exhibits, the elimination of labor rights at USAGM was unconstitutional retaliation against Plaintiffs for exercising their First Amendment rights and was *ultra vires*, and Plaintiffs and their members face irreparable harm due to Defendants' actions. As such, Plaintiffs move this Court, pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, to enter a preliminary injunction enjoining Defendants from implementing or otherwise giving effect to Sections 1 and 2 of Executive Order 14343 with respect to Plaintiffs' bargaining units at USAGM and all employees in said bargaining units. Plaintiffs further request all other appropriate relief necessary for the effectiveness of such preliminary injunction and request that the court set a security bond in the amount of \$100.

Respectfully submitted,

Date: September 19, 2025

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