IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

NATIONAL WEATHER SERVICE SERVICE EMPLOYEES ORGANIZATION, et al.,

Plaintiffs.

v. : Case No. 1:25-cv-02947-PLF

DONALD J. TRUMP, et al.,

Defendants.

MOTION FOR PRELIMINARY INJUNCTION FILED BY NATIONAL WEATHER SERVICE EMPLOYEES ORGANIZATION AND PATENT OFFICE PROFESSIONAL ASSOCIATION

Plaintiffs National Weather Service Employees Organization ("NWSEO") and Patent Office Professional Association ("POPA") (collectively "Plaintiffs") respectfully submit this motion for preliminary injunctive relief pursuant to Fed. R. Civ. P. 65 and L. Civ. R. 65.1. The Plaintiffs respectfully request a hearing on the motion on November 13, 2025.

Defendant Donald J. Trump issued Executive Order No. 14251 on March 27, 2025 and Executive Order No. 14,343 on August 28, 2025, which together deprive an overwhelming majority of employees of their rights to organize and bargain collectively, including an overwhelming majority of the employees represented by both NWSEO and POPA. Defendants Howard W. Lutnick, Laura Grimm and Coke Morgan Stewart have taken steps to implement the Executive Orders. This unlawful conduct threatens to eliminate the rights to organize and bargain collectively, not because of any legitimate "national security" issues, but to retaliate against unions, like NWSEO and POPA, for their efforts to represent these employees. These employees

have lost the ability to bargain collectively at a time when it matters the most, as the Administration continues to make significant, ongoing changes to employees' working conditions and employment. This lost ability and opportunity to bargain results in harms to those employees and the Plaintiffs that are immeasurable and that will become irreparable absent emergency relief.

For these reasons, along with those in the accompanying Memorandum in Support, Plaintiffs respectfully request this Court to enjoin the application and enforcement of Section 2 of Executive Order Nos. 14,251 and 14,343.

DATED: October 23, 2025 Respectfully submitted,

By: /s/ Richard J. Hirn

Richard J. Hirn
D.C. Bar No. 291849
5335 Wisconsin Ave., NW, Suite 440
Washington, D.C. 20015
(202) 274-1812
richard@hirnlaw.com

Keith R. Bolek
Bar No. 463129
April H. Pullium
Bar No. 198026
O'Donoghue & O'Donoghue LLP
5301 Wisconsin Avenue, Suite 800
Washington, D.C. 20015
(202) 362-0041
kbolek@odonoghuelaw.com
apullium@odonoghuelaw.com

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2025, I electronically filed true and correct copies of

Plaintiffs Motion for Preliminary Injunction; the Memorandum in Support, along with all

accompanying Declarations and Exhibits; and a Proposed Order via CM/ECF, which will send

notice of the filing to counsel for all parties. Pursuant to the Court's Standing Order No. 25-55,

true and correct copies of the aforementioned documents also are being sent via email to the Civil

Division of the U.S. Attorney's Office for the District of Columbia at

<u>USADC.ServiceCivil@usdoj.gov</u> and to the Civil Chief for the U.S. Attorney's Office for the

District of Columbia at brian.hudak@usdoj.gov.

Dated: October 23, 2025

/s/ April H. Pullium April H. Pullium

3