

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

CITIZENS FOR RESPONSIBILITY AND  
ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DOGE SERVICE, *et al.*,

Defendants.

Case No. 1:25-cv-00511

**HEARING REQUESTED**

**PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Citizens for Responsibility and Ethics in Washington respectfully moves for a preliminary injunction in this Freedom of Information Act (“FOIA”) and Federal Records Act (“FRA”) suit against the United States DOGE Service (“USDS”); John Doe, in their official capacity as Administrator of the U.S. DOGE Service; Elon Musk, in his official capacity; the Office of Management and Budget (“OMB”); and Russell Vought, in his official capacity as Director of OMB. The requested injunction would require Defendants to (1) fully process CREW’s FOIA requests and produce all non-exempt records along with a *Vaughn* index sufficiently in advance of the March 14, 2025 expiration date for the continuing resolution funding the government, no later than March 10, 2025, and (2) preserve all potentially responsive records pending final resolution of the case. In support of this motion, Plaintiff submits the attached memorandum of points and authorities, the Declaration of Jonathan Maier and accompanying exhibits, and a proposed order.

Per Local Civil Rule 65.1(c) and (d), Plaintiff respectfully requests that the Court order Defendant file its opposition to this motion by no later than February 27, 2025, and set a hearing

at the earliest available date not later than March 5, 2025. As explained in the accompanying memorandum, expedition is essential to prevent imminent irreparable harm to Plaintiff caused by Defendants' ongoing failure to process, release, and commit to preserving records in violation of FOIA and the FRA.

Plaintiff's counsel attempted to confer in good faith with Defendants' counsel prior to filing this motion by contacting relevant officials at the Department of Justice. As of the time of this filing, those officials have not relayed their position on this motion.

Dated: February 20, 2025

Respectfully submitted,

/s/ Nikhel S. Sus

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*\*Pro hac vice application forthcoming*