UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JENNER & BLOCK LLP,

Plaintiff,

v.

Civil Case No. 1:25-cv-00916

U.S. DEPARTMENT OF JUSTICE, et al.,

Defendants.

[PROPOSED] ORDER GRANTING TEMPORARY RESTRAINING ORDER

Upon Consideration of Plaintiff Jenner & Block LLP's Motion for a Temporary Restraining Order ("TRO") and accompanying memorandum, declarations, and exhibits, it is hereby:

ORDERED that the Motion is **GRANTED**; it is further

ORDERED that the Defendants are **ENJOINED** from implementing or enforcing Sections 1, 3, and 5 of the President's March 25, 2025 Executive Order entitled "Addressing Risks from Jenner & Block"; it is further

ORDERED that Defendants are **ENJOINED** from using the statements laid out in Section 1 of the Executive Order in any interactions with Plaintiff or Plaintiff's clients, or employee of Plaintiff or Plaintiff's clients; it is further

ORDERED that Defendants are **DIRECTED** to suspend and rescind all guidance or other direction provided to their officers, staff, employees, or contractors to communicate, effectuate, implement, or enforce Sections 1, 3, and 5 of the Executive Order; it is further

ORDERED that Defendants are **DIRECTED** immediately to issue guidance to their officers, staff, employees, and contractors to disregard Sections 1, 3, and 5, of the Executive Order

and to carry on their ordinary course of business absent these Sections of the Executive Order; it is further

ORDERED that Defendants are **DIRECTED** immediately to (1) communicate to every recipient of a request for disclosure of any relationship with Jenner & Block LLP or any person associated with the Firm, made pursuant to Section 3(a) of the Executive Order, that such request is rescinded until further order of the Court; and (2) cease making such requests for disclosure, pursuant to Section 3(a) of the Executive Order, until further order of the Court; it is further

ORDERED that Defendants must, in good faith, take such other steps as are necessary to prevent the enforcement or implementation of Sections 1, 3, and 5 of the Executive Order during the effective period of this Order; it is further

ORDERED that Defendants U.S. Department of Justice, Pamela Bondi, in her official capacity as U.S. Attorney General; the Office of Management and Budget; and Russell Vought, in his official capacity as director of the Office of Management and Budget, must additionally immediately issue guidance to all other agencies subject to the Executive Order to suspend and rescind any implementation or enforcement of Sections 1, 3, and 5 of the Executive Order, including any reliance on the statements in Section 1 of the Order; it is further

ORDERED that Defendants must file a status report within 24 hours of the issuance of this Order describing the steps taken to ensure compliance with this Order and certifying compliance with its requirements; and it is further

ORDERED that this Order shall remain in effect until further order of this Court. IT IS SO ORDERED.

Dated: _____

U.S. District Judge