

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

WILMER CUTLER PICKERING HALE AND DORR LLP,

Plaintiff,

v.

EXECUTIVE OFFICE OF THE PRESIDENT, U.S. DEPARTMENT OF JUSTICE, U.S. DEPARTMENT OF DEFENSE, U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES, U.S. DEPARTMENT OF EDUCATION, U.S. DEPARTMENT OF VETERANS AFFAIRS, OFFICE OF MANAGEMENT AND BUDGET, OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE, CENTRAL INTELLIGENCE AGENCY, ENVIRONMENTAL PROTECTION AGENCY, DEPARTMENT OF HOMELAND SECURITY, DEPARTMENT OF STATE, DEPARTMENT OF ENERGY, DEPARTMENT OF THE TREASURY, DEPARTMENT OF LABOR, DEPARTMENT OF AGRICULTURE, DEPARTMENT OF COMMERCE, DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT, SMALL BUSINESS ADMINISTRATION, OFFICE OF THE U.S. TRADE REPRESENTATIVE, DEPARTMENT OF THE INTERIOR, DEPARTMENT OF TRANSPORTATION, SECURITIES AND EXCHANGE COMMISSION, FEDERAL TRADE COMMISSION, U.S. PATENT AND TRADEMARK OFFICE, EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, THE UNITED STATES OF AMERICA, *and, in their official capacities*, PAMELA J. BONDI, PETE HEGSETH, ROBERT F. KENNEDY, JR., LINDA M. MCMAHON, DOUGLAS A. COLLINS, RUSSELL T. VOUGHT, TULSI GABBARD, JOHN L. RATCLIFFE, LEE M. ZELDIN, KRISTI NOEM, MARCO RUBIO, CHRIS WRIGHT, SCOTT BESSANT, LORI CHAVEZ-DEREMER, BROOKE L. ROLLINS, HOWARD LUTNICK, SCOTT TURNER, KELLY LOEFFLER, JAMIESON GREER, DOUG BURGUM, SEAN DUFFY, MARK T. UYEDA, ANDREW N. FERGUSON, COKE MORGAN STEWART, ANDREA R. LUCAS,

Defendants.

Case No. 1:25-cv-917

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Upon consideration of Plaintiff Wilmer Cutler Pickering Hale and Dorr LLP's Motion for a Temporary Restraining Order and Preliminary Injunction; the memorandum, declarations, and exhibits submitted in support; and arguments in support and in opposition, it is hereby:

- (1) ORDERED that Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction is GRANTED; it is further
- (2) ORDERED that Defendants are ENJOINED from implementing or giving effect to the presidential directive of March 27, 2025, entitled *Addressing Risks From WilmerHale* ("Order"), in any way, including by relying on any of the statements in §1; it is further
- (3) ORDERED that Defendants are DIRECTED to rescind any and all guidance or direction that has already issued that relates to implementing or enforcing the Order; it is further
- (4) ORDERED that Defendants are DIRECTED to immediately issue guidance to their officers, staff, employees, and contractors to disregard the Order and carry on with their ordinary course of business as if the Order had never issued; it is further
- (5) 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 Order to suspend and rescind any implementation or enforcement; it is further
- (6) ORDERED that Defendants are DIRECTED to take, in good faith, any other steps that are necessary to prevent the implementation or enforcement of the Order.

SO ORDERED.

Dated: _____

/s/ _____
United States District Judge

This Order shall be served upon:

EXECUTIVE OFFICE OF THE PRESIDENT
1600 Pennsylvania Avenue NW, Washington, DC 20500

U.S. DEPARTMENT OF JUSTICE,
950 Pennsylvania Avenue NW, Washington, DC 20530

U.S. DEPARTMENT OF DEFENSE,
1000 Defense Pentagon, Washington, DC 20301

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES,
200 Independence Avenue SW, Washington, DC 20201

U.S. DEPARTMENT OF EDUCATION
400 Maryland Avenue SW, Washington, DC 20202

U.S. DEPARTMENT OF VETERANS AFFAIRS
810 Vermont Avenue NW, Washington, DC 20420

OFFICE OF MANAGEMENT AND BUDGET,
725 17th Street NW, Washington, DC 20503

OFFICE OF THE DIRECTOR OF NATIONAL INTELLIGENCE,
Office of General Counsel, Washington, DC 20511

CENTRAL INTELLIGENCE AGENCY
Litigation Division, Office of General Counsel, Central Intelligence Agency
Washington, DC 20505

ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue NW, Washington, DC 20460

DEPARTMENT OF HOMELAND SECURITY
2707 Martin Luther King Jr Avenue SW, Mail Stop 0485, Washington, DC 20528

DEPARTMENT OF STATE
Suite 5.600, 600 19th Street NW, Washington, DC 20522

DEPARTMENT OF ENERGY
1000 Independence Avenue SW, Washington, DC 20585

DEPARTMENT OF THE TREASURY
1500 Pennsylvania Avenue NW, Washington, DC 20220

DEPARTMENT OF LABOR
200 Constitution Avenue NW, Washington, DC 20210

DEPARTMENT OF AGRICULTURE
1400 Independence Avenue, SW, Washington, DC 20250

DEPARTMENT OF COMMERCE
1401 Constitution Avenue NW, Washington, DC 20230

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
451 Seventh Street SW, Washington, DC 20410

SMALL BUSINESS ADMINISTRATION
409 Third Street SW, Washington, DC 20416

OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE
600 17th Street NW, Washington, DC 20508

DEPARTMENT OF THE INTERIOR
1849 C Street NW, Washington, DC 20240

DEPARTMENT OF TRANSPORTATION
1200 New Jersey Avenue SE, Washington, DC 20590

SECURITIES AND EXCHANGE COMMISSION
100 F Street NE, Washington, DC 20549

FEDERAL TRADE COMMISSION
600 Pennsylvania Avenue NW, Washington, DC 20580

UNITED STATES PATENT AND TRADEMARK OFFICE
600 Dulany Street, Alexandria, VA 22314

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
131 M Street NE, Washington, DC 20507

THE UNITED STATES OF AMERICA,
U.S. Attorney's Office for the District of Columbia
601 D Street NW, Washington, DC 20530

PAMELA J. BONDI, in her official capacity as Attorney General of the United States,
950 Pennsylvania Avenue NW, Washington, DC 20530

PETE HEGSETH, in his official capacity as the Secretary of Defense
U.S. Department of Defense
1000 Defense Pentagon, Washington, DC 20301

ROBERT F. KENNEDY, JR., in his official capacity as Secretary of Health and Human Services,
U.S. Department of Health and Human Services
200 Independence Avenue SW, Washington, DC 20201

LINDA M. MCMAHON, in her official capacity as Secretary of Education,
U.S. Department of Education
400 Maryland Avenue SW, Washington, DC 20202

DOUGLAS A. COLLINS, in his official capacity as Secretary of Veterans Affairs
Department of Veterans Affairs
810 Vermont Avenue NW, Washington, DC 20420

RUSSELL T. VOUGHT, in his official capacity as Director of The U.S. Office of Management and Budget,
725 17th Street NW, Washington, DC 20503

TULSI GABBARD, in her official capacity as U.S. Director of National Intelligence,
1500 Tysons McLean Drive, McLean, VA 22102

JOHN L. RATCLIFFE, in his official capacity as Director of the Central Intelligence Agency,
Office of Public Affairs, Central Intelligence Agency
Washington, DC 20505

LEE M. ZELDIN, in his official capacity as Administrator of the Environmental Protection Agency,
1200 Pennsylvania Avenue NW, Washington, DC 20460

KRISTI NOEM, in her official capacity as Secretary of Homeland Security
2707 Martin Luther King Jr Avenue SW, Mail Stop 0485, Washington, DC 20528

MARCO RUBIO, in his official capacity as Secretary of State
Suite 5.600, 600 19th Street NW, Washington DC 20522

CHRIS WRIGHT, in his official capacity as Secretary of Energy
1000 Independence Avenue SW, Washington, DC 20585

SCOTT BESSENT, in his official capacity as Treasury Secretary
1500 Pennsylvania Avenue NW, Washington, DC 20220

LORI CHAVEZ-DEREMER, in her official capacity as Secretary of Labor
200 Constitution Avenue NW, Washington, DC 20210

BROOKE L. ROLLINS, in her official capacity as Secretary of Agriculture
1400 Independence Avenue SW, Washington, DC 20250

HOWARD LUTNICK, in his official capacity as Secretary of Commerce
1401 Constitution Avenue NW, Washington, DC 20230

SCOTT TURNER, in his official capacity as Secretary of Housing and Urban Development
451 Seventh Street SW, Washington, DC 20410

KELLY LOEFFLER, in her official capacity as Administrator of the U.S. Small Business
Administration
409 Third Street SW, Washington, DC 20416

JAMIESON GREER, in his official capacity as United States Trade Representative
600 17th Street NW, Washington, DC 20508

DOUG BURGUM, in his official capacity as Secretary of the Interior
1849 C Street NW, Washington, DC 20240

SEAN DUFFY, in his official capacity as Secretary of Transportation
1200 New Jersey Avenue SE, Washington, DC 20590

MARK T. UYEDA, in his official capacity as Acting Chairman of the Securities and Exchange
Commission
100 F Street NE, Washington, DC 20549

ANDREW N. FERGUSON, in his official capacity as Chairman of the Federal Trade
Commission,
600 Pennsylvania Avenue NW, Washington, DC 20580

COKE MORGAN STEWART, in her official capacity as Acting Under Secretary of Commerce
for Intellectual Property and Acting Director of the United States Patent and Trademark Office,
600 Dulany Street, Alexandria, VA 22314

ANDREA R. LUCAS, in her official capacity as Acting Chair of the Equal Employment
Opportunity Commission,
131 M Street NE, Washington, DC 20507