

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

NATIONAL COUNCIL OF
NONPROFITS, et al.,

Plaintiffs,

v.

OFFICE OF MANAGEMENT AND
BUDGET, et al.,

Defendants.

Case No. 25-cv-239

[PROPOSED] ORDER GRANTING
MOTION FOR TEMPORARY RESTRAINING ORDER

Upon consideration of Plaintiffs' motion for a temporary restraining order, Defendants' opposition, Plaintiffs' reply, and argument held on February 3, 2025, it is hereby

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

ORDERED that Defendants are **ENJOINED** from implementing, giving effect to, or reinstating under a different name the directive in Memo M-25-13 with respect to the disbursement of Federal funds under all open awards; it is further

ORDERED that Defendants must promptly provide written notice of this Order and of the Court's administrative stay to all agencies to which the Memo was addressed and instruct those agencies that they must take no further steps to implement, give effect to, or reinstate under a different name

the directive in Memo M-25-13 with respect to the disbursements of Federal funds under all open awards, and that those agencies must also take immediate steps to release payments on open awards previously frozen in reliance on the Memo; it is further

ORDERED that Defendants must inform the Court by {DATE} of the specific steps they have taken to implement this Order and the previously entered administrative stay, including, but not limited to, filing on the docket a copy of the notice and directive provided under the previous paragraph and a list of its recipients; and it is further

ORDERED that this Order shall apply to the maximum extent provided for by Federal Rule of Civil Procedure 65(d)(2).

SO ORDERED.

Dated: February ____, 2025

THE HON. LOREN L. ALIKHAN
UNITED STATES DISTRICT JUDGE

**NAMES OF PERSONS TO BE SERVED
WITH PROPOSED ORDER UPON ENTRY**

Pursuant to Local Civil Rule 7(k), below are the names and addresses of persons entitled to be notified of entry of the above Proposed Order:

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Jessica Anne Morton (DC Bar No. 1032316)
Kevin E. Friedl* (Admitted only in New York; practice supervised by D.C. Bar members)
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CERTIFICATE OF SERVICE

On February 3, 2025, I caused the foregoing to be filed electronically via the Court's CM/ECF system, which provides electronic notice to all counsel of record. I further caused those documents to be served on pro se movant Beatrice Adams at the mailing address she has entered on the record.

Dated: February 3, 2025

/s/ Kevin E. Friedl
Kevin E. Friedl