

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

AIDS VACCINE ADVOCACY
COALITION, et al.,

Plaintiffs,

v.

UNITED STATES DEPARTMENT
OF STATE, et al.,

Defendants.

Civil Action No. 25-400 (AA)

PLAINTFFS’ MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Local Civil Rule 65.1(a), Plaintiffs AIDS Vaccine Advocacy Coalition and Journalism Development Network, Inc., hereby move for a temporary restraining order, to remain in effect until such time as the Court can further consider the merits of Plaintiffs’ claims, as follows:

- enjoining Defendants from enforcing or implementing Executive Order Number 14169, “Reevaluating and Realigning United States Foreign Aid” (Jan. 20, 2025);
- enjoining Defendants from enforcing or implementing the January 24, 2025, memorandum issued by Secretary of State Marco Rubio, with the subject line “Executive Order on Review of Foreign Assistance Programs” and numbered “25 STATE 6828”;

- enjoining Defendants from issuing, implementing, or enforcing any stop-work orders under the authority of the aforementioned Executive Order and memorandum; and
- enjoining Defendants to reinstate foreign assistance funding and to continue to administer all foreign assistance awards to the same extent and in the same manner as they did prior to January 20, 2025, according to the terms of the awards.

Pursuant to Local Rule 65.1(a), counsel for Plaintiffs emailed the three Assistant Directors for the Federal Programs Branch of the Department of Justice and the Chief of the Civil Division of the U.S. Attorney's Office in Washington, D.C. on February 12, 2025, shortly before filing this motion, to provide them with electronic copies of the complaint, this motion for a temporary restraining order, the accompanying memorandum, the Declarations of Mitchell Warren and Andrew Sullivan and associated exhibits, and a proposed order.

Dated: February 12, 2025

Respectfully submitted,

/s/ Nicolas A. Sansone

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