

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

PERSONAL SERVICES CONTRACTOR	)	
ASSOCIATION,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:25-cv-469
v.	)	
	)	
DONALD TRUMP, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

PLAINTIFF'S MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Local Civil Rule 65.1(a), Plaintiff (USAID) Personal Services

Contractor Association moves for a temporary restraining order directing Defendants to immediately:

- a. Return USAID workers employed as personal service contractors (USPSCs) to the terms and conditions of employment they enjoyed on January 19, 2025;
- b. Authorize USPSCs to resume and continue the work they were performing before January 20, 2025;
- c. Rescind any termination-of-contract notices sent to USPSCs since January 20, 2025, including notices sent in the last several hours, after Plaintiff notified the Department of Justice of impending legal action;
- d. Restore USPSCs' access to U.S. Government facilities, security, email, and computer and communications systems and networks;

- e. Release money to pay, and pay, USPSCs, including for back wages owed and for covered expenses they have already incurred but not been reimbursed for, consistent with the terms of their contracts and any relevant statutes and regulations;
- f. Recall all mandatory evacuation orders for USPSCs issued since January 19, 2025, unless required for the safety of USPSCs;
- g. Immediately arrange medevac procedures and other appropriate medical care for all pregnant USPSCs in their third trimester and their family members; and
- h. Cease disclosing USPSCs' personally identifying information on and remove that information from the DOGE website.

Plaintiff also requests that Defendants be required to file a status report within 24 hours of the entry of any temporary restraining, and at regular intervals thereafter, confirming their compliance with the order.

Concurrently with this motion, Plaintiff is also filing a brief in support, and as set out in that brief, Defendants' actions violate Separation of Powers, the Take Care Clause, the Administrative Procedures Act, the Impoundment Control Act, and the Anti-Deficiency Act, and are inflicting ongoing and irreparable harm on Plaintiff's members.

Pursuant to Local Civil Rule 65.1(a), at 11:58 PM ET on February 18, 2025 counsel for Plaintiff emailed Christopher Edelman, Eric Hamilton, Indraneel Sur, and Lauren Wetzler, four Department of Justice attorneys representing the government in the related case *AFSA et al. v. Trump et al.*, Case No. 1:25-cv-352, attaching a copy of the complaint and providing actual notice that Plaintiff would file a motion for a temporary

restraining order in the morning, seeking immediate relief. At 8:24 AM ET on February 19, 2025, Department of Justice attorney Lauren Wetzler acknowledged receipt of the email. Immediately before making this application to the Court, Plaintiffs emailed DOJ counsel electronic copies of the motion for temporary restraining order, and accompanying brief, declarations, and proposed order.

Dated: February 19, 2025

Respectfully submitted,

/s/ Marni Willenson

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