

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

NATIONAL COUNCIL OF  
NONPROFITS,  
1001 G Street NW, Suite 700 East  
Washington, D.C. 20001,

AMERICAN PUBLIC HEALTH  
ASSOCIATION,  
800 I Street NW  
Washington, D.C. 20001,

MAIN STREET ALLIANCE,  
909 Rose Avenue  
North Bethesda, Md. 20852,

and

SAGE,  
305 7th Avenue, 15th Floor  
New York, N.Y. 10001,

*Plaintiffs,*

v.

Case No. 25-cv-239

OFFICE OF MANAGEMENT AND  
BUDGET,  
725 17th Street, N.W.  
Washington, D.C. 20503,

and

MATTHEW VAETH, in his official  
capacity as Acting Director, Office of  
Management and Budget  
725 17th Street, N.W.  
Washington, D.C. 20503,

*Defendants.*

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**[PROPOSED] ORDER GRANTING TEMPORARY RESTRAINING ORDER**

Upon consideration of Plaintiffs' motion for a temporary restraining order and accompanying brief, it is hereby

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

**ORDERED** that the Office of Management and Budget and its Acting Director Matthew Vaethe are **ENJOINED** from implementing or enforcing OMB's January 27, 2025 Memorandum entitled "Temporary Pause of Agency Grant, Loan, and Other Financial Assistance Programs" until further order of this Court.

Defendants are further **ORDERED** to file a status report within 24 hours of the issuance of this order, and every two weeks thereafter for 12 weeks, confirming the regular disbursement and obligation of federal financial assistance funds.

**SO ORDERED.**

Dated: January \_\_\_\_, 2025

\_\_\_\_\_  
THE HON. \_\_\_\_\_  
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:

OFFICE OF MANAGEMENT & BUDGET  
725 17th Street, N.W.  
Washington, D.C. 20503,

MATTHEW VAETHE, in his official capacity as Acting Director  
Office of Management and Budget  
725 17th Street, N.W.  
Washington, D.C. 20503

U.S. Attorney for the District of Columbia  
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United States Attorney's Office  
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Attorney General of the United States  
c/o Assistant Attorney General for Administration  
U.S. Department of Justice  
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United States Department of Justice  
Civil Division, Federal Programs Branch  
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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)  
Kaitlyn Golden (DC Bar No. 1034214)  
Robin F. Thurston (DC Bar No. 1531399)  
Skye L. Perryman\* (D.C. Bar No. 984573)  
Will Bardwell\* (D.C. Bar No. 90006120)  
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\*motion to appear *pro hac vice* forthcoming