

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

JEFF MERKLEY
313 Hart Senate Office Building
120 Constitution Ave NE
Washington, DC 20510

Plaintiff,

Case No. 18-cv-02226-ABJ

v.

DONALD J. TRUMP
1600 Pennsylvania Avenue NW
Washington DC 20500

MITCH MCCONNELL
317 Russell Senate Office Building
2 Constitution Avenue NE
Washington, DC 20510

CHARLES GRASSLEY
135 Hart Senate Office Building
120 Constitution Ave NE
Washington, DC 20510

WILLIAM BURCK
1300 I Street NW Suite 900
Washington DC 20005

JULIE ADAMS
312 United States Capitol
East Capitol St NE & First St SE
Washington, DC 20004

MICHAEL STENGER
151 United States Capitol
East Capitol St NE & First St SE
Washington, DC 20004

NATIONAL ARCHIVES AND RECORDS
ADMINISTRATION (as indispensable party
per Fed. R. Civ. P. 19)
700 Pennsylvania Ave NW
Washington, DC 20408

Defendants.

PLAINTIFF'S MOTION FOR TEMPORARY RESTRAINING ORDER

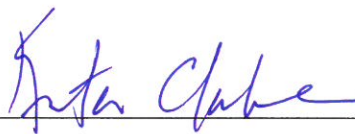
Plaintiff Senator Merkley hereby moves for a temporary restraining order as set forth in the accompanying Memorandum of Law in Support of Plaintiffs' Motion for Temporary Restraining Order ("Memorandum"). *See* Fed. R. Civ. P. 65(b).

Pursuant to Local Rule 7(m), counsel for Plaintiffs state that they were unable to discuss this motion with opposing counsel because the initial Complaint was filed a few business days ago and opposing counsel has not yet been identified.

For the foregoing reasons, Plaintiff respectfully requests that this Court grants his Motion for Temporary Restraining Order.

A proposed Order is attached hereto.

RESPECTFULLY SUBMITTED,

A handwritten signature in blue ink, appearing to read "Kristen Clarke", is written over a horizontal line.

Kristen Clarke (D.C. Bar # 973885)
Jon Greenbaum (D.C. Bar # 489887)
Samuel Weiss* (NY Bar # 5383229)
LAWYERS' COMMITTEE FOR CIVIL RIGHTS
UNDER LAW
1500 K St. NW
Suite 900
Washington, DC 20005
(202) 662-8600
kclarke@lawyerscommittee.org

* Member of the NY bar only; practicing in the District of Columbia under the supervision of

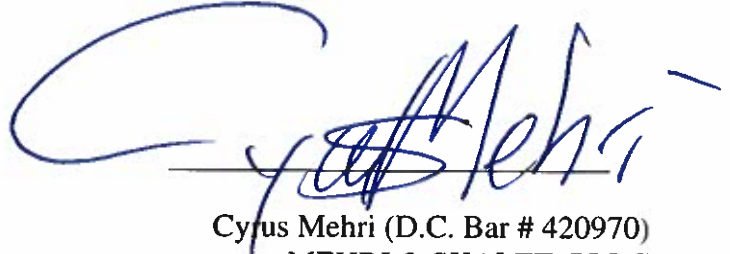
members of the D.C. Bar while application for D.C. Bar membership is pending. *Pro hac vice* motion to be submitted.

Cyrus Mehri (D.C. Bar # 420970)
U.W. Clemon (D.C. Bar # AL0013)
Michael Lieder (D.C. Bar # 444273)
Joanna K. Wasik (D.C. Bar # 1027916)
MEHRI & SKALET, PLLC
1250 Conn. Ave., NW
Suite 300
Washington, DC 20036
(202) 822-5100
cmehri@findjustice.com

CERTIFICATE OF SERVICE

I hereby certify that Plaintiff's Motion for Temporary Restraining Order and all attendant papers ("Motion") were filed via ECF on October 2, 2018. Plaintiffs effectuated service of the Complaint in this action (ECF 1) via hand delivery on the U.S. Attorney for the District of Columbia as well as the Attorney General of the United States on September 28, 2018. Plaintiffs also caused Defendants to be served with the Complaint (ECF 1) via registered mail.

Given that Counsel has not yet been identified, Plaintiff will endeavor to provide hand-delivery of this motion to all Defendants for whom hand-delivery is feasible on October 3, 2018. Plaintiff will also mail this motion by UPS express delivery to all Defendants as well as the U.S. Attorney for the District of Columbia and the Attorney General of the United States on October 3, 2018.



Cyrus Mehri (D.C. Bar # 420970)
MEHRI & SKALET, PLLC
1250 Conn. Ave., NW
Suite 300
Washington, DC 20036
(202) 822-5100
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