

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

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON, *et al.*,
Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 19-cv-1333 (ABJ)

PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Rule 65 of the Federal Rules of Civil Procedure and LCvR 65.1, Plaintiffs in the above-captioned action hereby move the Court to enter a temporary restraining order required Defendants to immediately preserve for the duration of this litigation: (1) all records reflecting Defendants' meetings, phone calls, and other communications with foreign leaders; (2) all records reflecting policies and practices regarding recordkeeping of Defendants' meetings, phone calls, and other communications with foreign leaders; (3) all records reflecting White House or agency investigations of Defendants' recordkeeping policies and practices regarding meetings, phone calls, and other communications with foreign leaders; (4) all records reflecting Defendants' communication of recordkeeping policies or practices to other components of the executive branch; (5) all records reflecting instructions, guidance, or legal advice about recordkeeping requirements; and (6) all records of efforts by White House or other executive branch officials to return, claw back, "lock down," or recall White House records reflecting Defendants' meetings, phone calls, and other communications with foreign leaders that were distributed to or otherwise shared with agency officials.

Commented [a1]: Shouldn't we specify subject matter?

Further, Plaintiffs respectfully request that the Court schedule a hearing on this motion at the Court's earliest convenience. As grounds for this motion, the Court is respectfully referred to the memorandum of points and authorities filed with this motion.

Respectfully submitted,

BAKER & MCKENZIE LLP

CITIZENS FOR RESPONSIBILITY AND
ETHICS IN WASHINGTON

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