

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES INSTITUTE FOR PEACE, *et al.*,

*Plaintiffs,*

–v.–

KENNETH JACKSON, in his official capacity as  
Assistant to the Administrator for Management and  
Resources for USAID, *et al.*,

*Defendants.*

Case No. \_\_\_\_\_

**[PROPOSED] ORDER GRANTING IMMEDIATE ADMINISTRATIVE STAY AND  
TEMPORARY RESTRAINING ORDER**

Upon consideration of Plaintiffs’ motion for a temporary restraining order and immediate administrative stay, accompanying brief and all materials submitted in support thereof, it is hereby

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

**ORDERED** that Defendants’ purported removal of (i) the members of the Board of Directors of the United States Institute of Peace (“the Institute” or “USIP”) who were duly appointed under 22 U.S.C. § 4605(b)(4), and (ii) the President of the Institute, are unlawful, null, and void, and without legal effect; it is further

**ORDERED** that the Institute’s Board members duly appointed under 22 U.S.C. § 4605(b)(4) and the Institute’s President may not be removed or in any way be treated as having been removed, or otherwise be obstructed from their ability to carry out their respective duties, absent express permission from the Court upon a finding that the action to remove them complies

with the United States Institute of Peace Act, Pub. L. No. 98-525, tit. XVII, § 1701, 98 Stat. 2492, 2649 (1984), 22 U.S.C. § 4601-4611, as amended (“USIP Act”); it is further

**ORDERED** that Defendants are enjoined from further trespass against the real and personal property belonging to the Institute and its employees, contractors, agents, and other representatives; and it is further

**ORDERED** that Defendants, or any other person acting in concert with Defendants, are enjoined from maintaining, retaining, gaining, or exercising any access or control over the Institute’s offices, facilities, computer systems, or any other records, files, or resources, and from acting or purporting to act in the name of Institute, and from using the Institute’s name, emblem, badge, seal and any other mark of recognition of the Institute until the Court has an opportunity to fully consider and decide upon the issues raised in this Complaint.

\_\_\_\_\_  
The Hon. \_\_\_\_\_  
United States District Judge

Dated: March \_\_\_\_\_, 2025