

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

SHIRA PERLMUTTER,

*Plaintiff,*

v.

TODD BLANCHE *et al.*,

*Defendants.*

Case No. 25-cv-1659

**PLAINTIFF SHIRA PERLMUTTER'S MOTION  
FOR A TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b) of the Federal Rules of Civil Procedure and Local Civil Rule 65.1, Plaintiff Shira Perlmutter, by undersigned counsel, respectfully moves for the immediate issuance of a temporary restraining order (TRO) enjoining Defendants from unlawfully attempting to remove Ms. Perlmutter from her position as Register of Copyrights and Director of the U.S. Copyright Office. The precise contours of the order that Plaintiff seeks are provided in the proposed order attached to this Motion.

Emergency relief is necessary due to the exigency of the circumstances created by Defendants' unlawful conduct and the irreparable injuries that the requested temporary restraining order is intended to prevent. Plaintiff respectfully requests that the Court dispense with the security referenced in Federal Rule of Civil Procedure 65(c), for the reasons stated in its memorandum in support of this Motion. Plaintiff respectfully requests a prompt hearing on this Motion.

The grounds for this Motion are set forth in the attached memorandum of law and its supporting declaration. A proposed order is attached.

Pursuant to Local Rule 65.1(a), at 6:13p.m. on May 22, 2025, counsel for Ms. Perlmutter emailed Alex Haas, Diane Kelleher, and John Griffiths, Directors of the Federal Programs Branch of the Department of Justice, to provide a copy of the complaint and, pursuant to Local Civil Rule 65.1(a), to provide actual notice that Ms. Perlmutter intended to file a motion for temporary restraining order shortly. Counsel for Ms. Perlmutter provided the motion and accompanying brief, declaration, and proposed order to Mr. Haas, Ms. Kelleher, and Mr. Griffiths before completing this electronic filing.

Dated: May 22, 2025

Respectfully submitted,

/s/ Allyson R. Scher

Brian D. Netter (D.C. Bar No. 979362)  
Allyson R. Scher (D.C. Bar No. 1616379)  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, DC 20043  
(202) 448-9090  
bnetter@democracyforward.org  
ascher@democracyforward.org

Donald B. Verrilli, Jr. (D.C. Bar. No. 420434)  
Ginger D. Anders (D.C. Bar. No. 494471)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue, NW, Suite 500E  
Washington, D.C. 20001  
(202) 220-1100  
donald.verrilli@mto.com  
ginger.anders@mto.com

Kuruvilla J. Olasa (*pro hac vice* forthcoming)  
James R. Salzmann (*pro hac vice* forthcoming)  
Miranda E. Rehaut (*pro hac vice* forthcoming)  
Adeel Mohammadi (*pro hac vice* forthcoming)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, California 90071  
(213) 683-9100

kuruvilla.olasamto.com  
james.salzmannmto.com  
miranda.rehautmto.com  
adeel.mohammadiamto.com

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 22, 2025, I filed the foregoing document with the Clerk of the Court for the U.S. District Court for the District of Columbia using the court's CM/ECF system.

I further certify that a copy of the foregoing and accompanying memorandum and attachments will be deposited with the U.S. Postal Service, for delivery to the below Defendants by certified mail:

|   |   |
|---|---|
| Todd Blanche<br>Claimed Acting Librarian of Congress<br>Library of Congress<br>101 Independence Avenue SE<br>Washington, DC 20559 | Paul Perkins<br>Claimed Acting Register of Copyrights<br>U.S. Copyright Office<br>101 Independence Avenue SE<br>Washington, DC 20559      |
| Sergio Gor<br>Director of the White House Presidential<br>Personnel Office<br>1600 Pennsylvania Avenue NW<br>Washington, DC 20500 | Trent Morse<br>Deputy Director of the White House<br>Presidential Personnel Office<br>1600 Pennsylvania Avenue NW<br>Washington, DC 20500 |
| Executive Office of the President<br>1600 Pennsylvania Avenue NW<br>Washington, DC 20500  | Donald J. Trump<br>President of the United States<br>1600 Pennsylvania Avenue NW<br>Washington, DC 20500                                  |

/s/ Allyson R. Scher

Allyson R. Scher (D.C. Bar No. 1616379)  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, DC 20043  
(202) 448-9090  
ascher@democracyforward.org

*Counsel for Plaintiff*