

EXHIBIT A

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF RHODE ISLAND; STATE OF
NEW YORK; STATE OF HAWAI'I; STATE
OF ARIZONA; STATE OF CALIFORNIA;
STATE OF COLORADO; STATE OF
CONNECTICUT; STATE OF DELAWARE;
STATE OF ILLINOIS; STATE OF MAINE;
STATE OF MARYLAND;
COMMONWEALTH OF MASSACHUSETTS;
PEOPLE OF THE STATE OF MICHIGAN;
STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE
OF NEW MEXICO; STATE OF OREGON;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States; INSTITUTE OF
MUSEUM AND LIBRARY SERVICES;
KEITH E. SONDERLING, in his official
capacity as Acting Director of the Institute of
Museum and Library Services; MINORITY
BUSINESS AND DEVELOPMENT AGENCY;
MADIHA D. LATIF, in her official capacity as
Deputy Under Secretary of Commerce for
Minority Business Development; HOWARD
LUTNICK, in his official capacity as Secretary
of Commerce; FEDERAL MEDIATION AND
CONCILIATION SERVICE; GREGORY
GOLDSTEIN, in his official capacity as Acting
Director of the Federal Mediation and
Conciliation Service; OFFICE OF
MANAGEMENT AND BUDGET; RUSSELL
T. VOUGHT, in his official capacity as Director
of the Office of Management and Budget;

Defendants.

Case No.: 1:25-cv-128

[PROPOSED] PRELIMINARY INJUNCTION ORDER

For the reasons contained in this Court’s Memorandum and Order (ECF No. 57), it is hereby ORDERED that a PRELIMINARY INJUNCTION is entered in this case. Defendants, their officers, agents, employees, and attorneys, and any other persons who are in active concert or participation with Defendants or their officers, agents, employees, or attorneys,¹ shall:

1. Be restrained and prohibited from implementing, giving effect to, or keeping in force any policies, memoranda, directives, or actions issued prior to the date of this order that were designed or intended, in whole or in part, to implement, give effect to, comply with, or carry out the directives contained in Executive Order No. 14,238, “Continuing the Reduction of the Federal Bureaucracy” (Mar. 14, 2025) (the “Reduction EO”), with respect to the Institute of Museum and Library Services (IMLS), the Minority Business Development Agency (MBDA), or the Federal Mediation and Conciliation Service (FMCS);
2. Promptly take all necessary steps to reverse any policies, memoranda, directives, or actions issued prior to the date of this order that were designed or intended, in whole or in part, to implement, give effect to, comply with, or carry out the directives contained in the Reduction EO with respect to IMLS, MBDA, or FMCS;
3. Be restrained and prohibited from taking any further action during the pendency of this case to “eliminate[]” “the non-statutory components and functions” of IMLS, MBDA, or FMCS, or to “reduce the performance of their statutory functions and associated personnel to the minimum presence and function

¹ President Donald J. Trump is not enjoined by this Order.

required by law,” unless, as to each action, (a) Defendants provide a reasoned explanation for such action, including by taking into account any applicable reliance interests, and (b) such action will not prevent Defendants from fulfilling any of their statutory duties or expending funds appropriated by Congress; and

4. Within 7 days of the date of this order, file with the Court a status report that confirms Defendants’ full compliance with this order and that details the actions Defendants have taken to comply with the order.

Respectfully submitted,

[signatures begin on next page]

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CERTIFICATE OF SERVICE

I certify that on May 9, 2025, I electronically filed the foregoing document and that it is available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system

/s/Paul T.J. Meosky

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