

**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; GREG
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

**PLAINTIFF STATES' NOTICE OF
SUPPLEMENTAL AUTHORITY IN SUPPORT OF
THEIR MOTION FOR PRELIMINARY
INJUNCTION**

**PLAINTIFF STATES’ NOTICE OF SUPPLEMENTAL AUTHORITY
IN SUPPORT OF THEIR MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff States submit the following supplemental authority in support of their Motion for Preliminary Injunction (ECF No. 3).

On April 22, 2025, United States District Court for the District of Columbia granted in part and denied in part plaintiffs’ motion for a preliminary injunction concerning the shuttering of the United States Agency for Global Media (USAGM), one of the seven agencies to be dismantled pursuant to Executive Order 14238, “Continuing the Reduction of the Federal Bureaucracy”—the executive order at issue here.¹ *Patsy Widakuswara, et al. v. Kari Lake, et al.*, Case No. 1:25-cv-1015-RCL (D.D.C. Apr. 22, 2025) (a copy of the opinion is attached as Exhibit 1). The preliminary injunction ordered the government defendants, among other things, to “take all necessary steps to return USAGM employees and contractors to their status prior to [the executive order]”; “restore the FY 2025 grants with USAGM Networks Radio Free Asia and Middle East Broadcasting Networks”; and “restore [Voice of America (VOA)] programming such that USAGM fulfills its statutory mandate that VOA ‘serve as a consistently reliable and authoritative source of news[.]’” *See* Exhibit 2. The court did not impose a bond under Federal Rules of Civil Procedure Rule 65. Exhibit 1 at 35–36.

The *Widakuswara* opinion is directly relevant to this Court’s analysis of standing and ripeness; Defendants’ arguments regarding the Tucker Act and the emergency-docket order of

¹ The United States District Court for the Southern District of New York granted a temporary restraining order in *Widakuswara v. Lake*, No. 25-CV-2390 (JPO), 2025 WL 945867 (S.D.N.Y. Mar. 28, 2025) prior to the matter being transferred to the United States District Court for the District of Columbia. *See* ECF No. 3 at 20.

Department of Education v. California, 145 S. Ct. 966 (2025); Civil Service Reform Act channeling; the preliminary injunction factors, including irreparable harm; and the question of whether a bond should be imposed.

Respectfully submitted,

PETER F. NERONHA

Attorney General for the State of Rhode Island

/s/ Natalya A. Buckler

Kathryn M. Sabatini (RI Bar No. 8486)
Chief, Civil Division
Special Assistant Attorney General
Katherine Connolly Sadeck (RI Bar No. 8637)
Solicitor General
Assistant Attorney General
Keith D. Hoffmann (RI Bar No. 9872)
Chief of Policy
Assistant Attorney General
Natalya A. Buckler (RI Bar No. 8415)
Assistant Attorney General
Paul Meosky (RI Bar No. 10742)
Special Assistant Attorney General
150 South Main Street
Providence, RI 02903
Phone: (401) 274-4400
Fax: (401) 222-2995
ksabatini@riag.ri.gov
ksadeck@riag.ri.gov
khoffmann@riag.ri.gov
nbuckler@riag.ri.gov
pmeosky@riag.ri.gov

LETITIA JAMES

Attorney General for the State of New York

By: /s/ Abigail Katowitz-Liu

Abigail Katowitz-Liu
Assistant Attorney General
Rabia Muqaddam
Special Counsel for Federal Initiatives
Sean Bunny
Assistant Attorney General
28 Liberty St.
New York, NY 10005
(212) 416-8922
Abigail.katowitz-liu@ag.ny.gov
Rabia.muqaddam@ag.ny.gov
Sean.bunny@ag.ny.gov
Attorneys for the State of New York

ANNE E. LOPEZ

Attorney General for the State of Hawai'i

By: /s/ David D. Day

David D. Day
Special Assistant to the Attorney General
Kaliko'onālani D. Fernandes
Solicitor General
425 Queen Street
Honolulu, HI 96813
(808) 586-1360
david.d.day@hawaii.gov
kaliko.d.fernandes@hawaii.gov

KRISTIN K. MAYES

Attorney General
State of Arizona

/s/ Syreeta A. Tyrell

Syreeta A. Tyrell
Assistant Attorney General
2005 North Central Avenue
Phoenix, Arizona 85004
Phone: (602) 542-8310
Syreeta.Tyrell@azag.gov
ACL@azag.gov
Attorneys for the State of Arizona

ROB BONTA

ATTORNEY GENERAL OF
CALIFORNIA

/s/ Jay C. Russell

Jay C. Russell
Deputy Attorney General
Thomas S. Patterson
Senior Assistant Attorney General
Anya M. Binsacca
Supervising Deputy Attorney General
Zelda Vassar
Deputy Attorney General
California Attorney General's Office
455 Golden Gate Avenue, Suite 11000
San Francisco, CA 94102
(415) 510-3617
Jay.Russell@doj.ca.gov
Zelda.Vassar@doj.ca.gov
Counsel for the State of California

PHILIP J. WEISER

Attorney General of Colorado

By: /s/ David Moskowitz

David Moskowitz
Deputy Solicitor General
1300 Broadway, #10
Denver, CO 80203
(720) 508-6000new
David.Moskowitz@coag.gov

WILLIAM TONG

Attorney General
State of Connecticut

/s/ Ashley Meskill

Ashley Meskill
Assistant Attorney General
165 Capitol Avenue
Hartford, CT 06106
Phone: (860) 808 5270
Ashley.Meskill@ct.gov

KATHLEEN JENNINGS

Attorney General of the State of Delaware

By: /s/ Vanessa L. Kassab

IAN R. LISTON
Director of Impact Litigation
VANESSA L. KASSAB
Deputy Attorney General
Delaware Department of Justice
820 N. French Street
Wilmington, DE 19801
(302) 683-8899
vanessa.kassab@delaware.gov

KWAME RAOUL

Attorney General of Illinois

/s/ Holly F.B. Berlin

HOLLY F.B. BERLIN

Assistant Attorney General

Office of the Illinois Attorney General

115 S. LaSalle St.

Chicago, IL 60603

(312) 814-3000

holly.berlin@ilag.gov

Counsel for the State of Illinois

AARON M. FREYAttorney General for
the State of Maine/s/ Vivian A. Mikhail

Vivian A. Mikhail

Deputy Attorney General

Office of the Attorney General

6 State House Station

Augusta, ME 04333-0006

Tel.: 207-626-8800

Fax: 207-287-3145

Vivian.Mikhail@maine.gov**ANTHONY G. BROWN**

Attorney General for the State of Maryland

By: /s/ Keith M. Jamieson

Keith M. Jamieson

Assistant Attorney General

200 Saint Paul Place, 20th Floor

Baltimore, Maryland 21202

(410) 576-6960

kjamieson@oag.state.md.us

Attorneys for the State of Maryland

ANDREA JOY CAMPBELL

Attorney General of Massachusetts

/s/ Katherine Dirks

Katherine Dirks

Chief State Trial Counsel

Office of the Attorney General

One Ashburton Place, 20th Floor

Boston, MA 02108

(617) 963-2277

katherine.dirks@mass.gov

Attorney for the State of Massachusetts

DANA NESSELAttorney General for the People of
Michigan/s/ Neil Giovanatti

Neil Giovanatti

BreAnna Listermann

Assistant Attorneys General

Michigan Department of Attorney General

525 W. Ottawa

Lansing, MI 48909

(517) 335-7603

GiovanattiN@michigan.gov[ListermannB@michigan.gov](mailto>ListermannB@michigan.gov)**KEITH ELLISON**

Attorney General for the State of Minnesota

By: /s/ Jacob Harris

Jacob Harris

Assistant Attorney General

445 Minnesota Street, Suite 600

St. Paul, Minnesota, 55101

(651) 757-1156

Jacob.Harris@ag.state.mn.us

AARON D. FORD

Attorney General of Nevada

By: /s/ Heidi Parry Stern

Heidi Parry Stern (Bar. No. 8873)

Solicitor General

Office of the Nevada Attorney General

1 State of Nevada Way, Ste. 100

Las Vegas, NV 89119

HStern@ag.nv.gov

MATTHEW J. PLATKIN

Attorney General of New Jersey

/s/ Joshua Bohn

Joshua Bohn

Max Lesser*

Deputy Attorneys General

Office of the Attorney General

25 Market Street

Trenton, NJ 08625

(609) 696-5366

Joshua.Bohn@law.njoag.gov

Max.Lesser@law.njoag.gov

Counsel for the State of New Jersey

RAÚL TORREZ

Attorney General of New Mexico

/s/ Anjana Samant

Anjana Samant

Deputy Counsel for Impact Litigation

New Mexico Department of Justice

P.O. Drawer 1508

Santa Fe, NM 87504-1508

(505) 490-4060

asamant@nmdoj.gov

Attorney for Plaintiff State of New Mexico

DAN RAYFIELD

Attorney General for the State of Oregon

/s/ Brian Simmonds Marshall

Brian Simmonds Marshall

Senior Assistant Attorney General

100 SW Market Street

Portland, OR 97201

(971) 673-1880

brian.s.marshall@doj.oregon.gov

Attorneys for the State of Oregon

CHARITY R. CLARK

Attorney General for the State of Vermont

By: /s/ Ryan P. Kane

Ryan P. Kane

Deputy Solicitor General

109 State Street

Montpelier, VT 05609

(802) 828-2153

Ryan.kane@vermont.gov

NICHOLAS W. BROWN

Attorney General for the State of Washington

/s/ Kate S. Worthington

KATE S. WORTHINGTON, WSBA

#47556

SARAH E. SMITH-LEVY, WSBA #55770

Assistant Attorneys General

7141 Cleanwater Drive SW

P.O. Box 40111

Olympia, WA 98504-0111

(306) 709-6470

kate.worthington@atg.wa.gov

sarah.e.smith-levy@atg.wa.gov

Attorneys for Plaintiff State of Washington

JOSHUA L. KAUL

Attorney General for the State of Wisconsin

/s/ Colin T. Roth

COLIN T. ROTH

Assistant Attorney General

WI State Bar #1103985

Wisconsin Department of Justice Post Office Box 7857

Madison, Wisconsin 53707-7857

(608) 266-7636

rothct1@doj.state.wi.us

Attorney for Plaintiff State of Wisconsin

*Applications for pro hac vice forthcoming

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I filed the within via the ECF filing system and that a copy is available for viewing and downloading. I have also caused a copy to be sent via the ECF System to counsel of record on this 23rd day of April, 2025.

/s/ Natalya A. Buckler