

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

**NATIONAL TRUST FOR HISTORIC
PRESERVATION IN THE UNITED STATES,**

Plaintiff,

v.

NATIONAL PARK SERVICE, et al.,

Defendants.

Civil Action No. 25-4316

**[PROPOSED] ORDER GRANTING NATIONAL TRUST’S
MOTION FOR PRELIMINARY INJUNCTION**

This matter is before the Court on the motion of plaintiff, the National Trust for Historic Preservation in the United States (“National Trust”), for a preliminary injunction against defendants the National Park Service; Jessica Bowron, in her official capacity as Acting Director, National Park Service; John Stanwich, in his official capacity as Superintendent, the White House and President’s Park; the Department of the Interior; Douglas Burgum, in his official capacity as Secretary of the Interior; the General Services Administration; Michael J. Rigas, in his official capacity as Acting Administrator, General Services Administration; Donald J. Trump, in his official capacity as President of the United States; the Executive Office of the President; Susie Wiles, in her official capacity as White House Chief of Staff; the Office of the Executive Residence; and Robert B. Downing, in his official capacity as White House Chief Usher (together, “Defendants”). Having considered the motion, the memorandum in support, other papers filed in connection therewith, and the record in this case, and having otherwise been fully advised, it is hereby **ORDERED** that the National Trust’s motion for a preliminary injunction is **GRANTED**. It is further

ORDERED that the Defendants, and any agents of the Defendants or any other persons working at their direction or in active concert therewith, or subject to the Defendants' control, are **ENJOINED** from taking any and all actions in furtherance of the physical development of the Ballroom Project, including but not limited to any further demolition, site preparation work, subsurface work, removal of debris, removal of soil, landscape alteration, vegetation or tree removal, grading, excavation, digging, trenching, boring, filling, blasting, laying of foundations, laying of utilities, pile driving, construction equipment installation, or other construction or related work at the site of the former East Wing, other than specific limited actions, for which the Defendants must request and receive written approval of this Court, necessary for the sole purposes of ensuring, while this injunction is in effect, either (a) safe physical conditions at the site; or (b) the personal safety of the President;

ORDERED that, subject to the exception set forth above, no such work shall proceed until the Ballroom Project has been reviewed and approved of by the National Capital Planning Commission, and reviewed by the Commission of Fine Arts, *see* 40 U.S.C. §§ 8721-8722, 9102; 45 C.F.R. §§ 2101.1-2101.2; until an adequate environmental assessment and an adequate environmental impact statement have been prepared and published under the National Environmental Policy Act, 42 U.S.C. § 4331 *et seq.*; and until Congress has expressly authorized the construction of the Ballroom, *see* 40 U.S.C. § 8106;

ORDERED that the Defendants' counsel shall provide written notice of this Order to all officers, agents, successors, servants, employees, and attorneys of the Defendants, and any other persons working at their direction or in active concert therewith, or subject to the Defendants' control, and shall file a copy of the notice on the docket at the same time;

ORDERED that the Defendants shall file a status report, apprising the Court of the status of their compliance with this Order; and

ORDERED that the security requirement is hereby waived. *See* Fed. R. Civ. P. 65(c); *Nat'l Council of Nonprofits v. OMB*, 775 F. Supp. 3d 100, 130 (D.D.C. 2025).

Dated this ____ day of _____, 2025 BY THE COURT:

Richard J. Leon
United States District Judge

ATTORNEYS AND PARTIES TO BE NOTIFIED

Pursuant to Local Rule 7(k)

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