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

MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a) and Local Civil Rule 65.1(c), plaintiff, the National Trust for Historic Preservation in the United States (the "National Trust"), hereby moves for an order preliminarily enjoining the Defendants from further constructing a ballroom (the "Ballroom") on the former site of the East Wing of the White House, which the Defendants unlawfully demolished in late October 2025.[1] As explained in greater detail in the accompanying memorandum, the National Trust is likely to succeed on its claims, and the remaining factors—irreparable harm, balance of the equities, and the public interest—all weigh heavily in the Trust's favor.

Because the continuing, unlawful construction of the Ballroom makes the prompt issuance of preliminary injunctive relief essential, the National Trust requests that the Court expedite the consideration of this motion to the greatest extent possible. *See* Local Civil Rule 65.1(d). Due to the substantial briefing already submitted in this action, the two hearings that the Court has previously held, and the Court's stated willingness to consider these issues "expeditiously," ECF

[1] Pursuant to Local Civil Rule 7(m), on March 4, 2026, undersigned counsel conferred by electronic mail with counsel for the Defendants, who oppose this motion.

47 at 22, the National Trust does not believe that a hearing is necessary to resolve this motion; however, if the Court wishes to convene a hearing, counsel for the Trust is available at the Court's earliest convenience.

The National Trust respectfully requests that the Court grant its motion; issue a preliminary injunction in the form proposed by the National Trust and attached hereto; and issue any further relief as the Court deems just and warranted.

Dated: March 5, 2026

Respectfully submitted,

NATIONAL TRUST FOR HISTORIC PRESERVATION IN THE UNITED STATES

By its attorneys,

/s/ Matthew F. Casassa

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CERTIFICATE OF SERVICE

I certify that on March 5, 2026, the foregoing document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). Paper copies will be sent via first class mail to those indicated as non-registered participants.

/s/ Matthew F. Casassa