UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

KENNETH ROTH; DANIEL FROOMKIN; BEVERLY GAGE; PETER SCHMIDT-NOWARA; BENJAMIN WITTES; and ETHAN YOUNG,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States; STEVEN CHEUNG, in his official capacity as Assistant to the President for Communications; SEAN M. CURRAN, in his official capacity as Director of the Secret Service; and SUSAN WILES, in her official capacity as White House Chief of Staff,

Defendants.

Civil Action No. 1:26-cv-09327

[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

The Court, on consideration of Plaintiffs' Motion for a Preliminary Injunction, along with the accompanying memorandum, declarations, and exhibits, and any opposition, reply, and further pleadings and argument thereto, has determined that Plaintiffs are likely to succeed on the merits of their claim that the Policy—Defendants' policy and practice of imposing viewpoint-based and unreasonable restrictions on newsgathering and reporting in a limited public forum, the White House Press Forum—violates the First Amendment; that Plaintiffs will suffer irreparable injury in the absence of injunctive relief; and that the balance of the equities and the public interest favor preliminary relief.

It is therefore **ORDERED** that Plaintiffs' Motion for a Preliminary Injunction is **GRANTED**.

Accordingly, it is hereby **ORDERED** that Defendants Cheung, Curran, and Wiles; their officers, agents, servants, employees, and attorneys; and other persons who are in active concert or participation with Defendants or their officers, agents, servants, employees, and attorneys, *see* Fed. R. Civ. P. 65(d)(2), are preliminarily **ENJOINED** from enforcing the Policy on pain of contempt.

It is further **ORDERED** that Defendants Cheung, Curran, and Wiles shall transmit a copy of this Order to all personnel within the Executive Office of the President of the United States and the U.S. Secret Service by no later than five days from the date of this Order.

It is further **ORDERED** that Defendants Cheung, Curran, and Wiles shall file a notice describing the steps they have taken to comply with this Order by no later than seven days from the date of this Order.

It is further **ORDERED** that the bond requirement of Federal Rule of Civil Procedure 65(c) is waived.

IT IS SO ORDERED.

Dated: _____

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United States District Judge