

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

JOHN AND JANE DOES 1-9, et al.,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE,

Defendant.

Civil Action No. 25-0325 (JMC)

FEDERAL BUREAU OF INVESTIGATION  
AGENTS ASSOCIATION, et al.,

Plaintiffs,

v.

DEPARTMENT OF JUSTICE, et al.,

Defendants.

Civil Action No. 25-0328 (JMC)

**NOTICE OF PROPOSED ORDER**

The parties to these consolidated cases hereby provide notice to the Court as follows:

1. Having conferred, the parties consent to entry of the attached proposed order regarding the pending motions for a temporary restraining order in lieu of the adjudication of those motions at this time.

2. As part of the parties' conferral last evening, government counsel notified Plaintiffs' counsel that it had learned that evening that a record that pairs the unique identifiers on the list at issue in this case with the corresponding names of the FBI personnel had been provided to the Department by the FBI. The terms of the parties' proposed order encompass the list at issue

in these consolidated cases as well as any subsequent versions of that list, including any record pairing the unique identifiers on the list to names to reflect recent developments.

3. Accordingly, the parties request that the Court vacate the hearing scheduled for today on Plaintiffs' motions for a temporary restraining order and enter the attached proposed order.

Respectfully submitted,

CENTER FOR EMPLOYMENT JUSTICE

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Dated: February 7, 2025

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DEPARTMENT OF JUSTICE, et al.,

Defendants.

Civil Action No. 25-0328 (JMC)

**PROPOSED ORDER**

With the consent of the parties, the Court DEFERS RULING on Plaintiffs' motions for temporary restraining orders and ORDERS as follows:

1. The Government will not disseminate the list at issue in these consolidated cases (and any subsequent versions of that list, including any record pairing the unique identifiers on the list to names) to the public, directly or indirectly, before the Court rules on Plaintiffs' anticipated motions for a preliminary injunction.

2. Absent further order of the Court, the Government may terminate the proscription set forth in Paragraph 1 at its election by providing two business days' notice to the parties and the Court of its intent to terminate.

3. The following schedule shall govern Plaintiffs' anticipated motions for a preliminary injunction:

- a. Plaintiffs shall file their motions on or before February 24, 2025;
- b. Defendants shall file their opposition on or before March 14, 2025; and
- c. Plaintiffs shall file any replies on or before March 21, 2025.

SO ORDERED:

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Dated

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JIA M. COBB  
United States District Judge