

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

**CULTURAL HERITAGE PARTNERS,  
PLLC, et al.,**

Civil Action No. 1:25-cv-03969-DLF

Plaintiffs,

v.

**DONALD J. TRUMP, et al.,**

Defendants.

**PLAINTIFFS’ MOTION FOR  
TEMPORARY RESTRAINING ORDER,  
PRELIMINARY INJUNCTION, AND  
EXPEDITED HEARING**

**PLAINTIFFS’ MOTION FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY  
INJUNCTION, AND EXPEDITED HEARING**

Pursuant to Federal Rule of Civil Procedure 65(a)–(b) and Local Civil Rule 65.1, Plaintiffs Cultural Heritage Partners, PLLC, Gregory Alan Werkheiser, Marion Forsyth Werkheiser, and DC Preservation League (collectively, “Plaintiffs”), respectfully move this Court for a temporary restraining order and preliminary injunction enjoining Defendants from undertaking, authorizing, funding, or permitting any further activities associated with the proposed project to clean, repoint, and paint the exterior of the Eisenhower Executive Office Building (the “EEOB Project”), including but not limited to any preparation, priming, painting, coating, resurfacing, or other physical alteration of the exterior of the Eisenhower Executive Office Building (“EEOB”), and from taking any further steps to implement, rely upon, or act under any approvals related to the EEOB Project, unless and until Defendants have complied with the National Environmental Policy Act (“NEPA”), 42 U.S.C. §§ 4321–4370h; the National Historic Preservation Act (“NHPA”), 54 U.S.C. §§ 300101–307108; and the Administrative Procedure Act (“APA”), 5 U.S.C. §§ 701–706.

The grounds for this Motion are set forth in Plaintiffs’ Memorandum of Law in Support of Plaintiffs’ Emergency Motion for Temporary Restraining Order and Preliminary Injunction, filed contemporaneously herewith, and in the declarations and exhibits submitted in support of that Memorandum, together with all other materials on file in this action.

Pursuant to Local Civil Rule 65.1(d), Plaintiffs respectfully request expedited consideration and a prompt hearing on this Motion. Expedition is essential because the Project is imminent: President Trump has publicly announced his intention to paint the EEOB, displayed before-and-after images, and stated that he is “getting bids right now from painters” for a project that will involve cleaning, repointing, and painting. In the absence of immediate injunctive relief, there is a substantial risk that Defendants will commence work on the EEOB’s exterior, causing irreparable harm to the building’s historic fabric, appearance, and setting—and to Plaintiffs’ concrete aesthetic, recreational, professional, organizational, and economic interests in that historic property—before this Court can adjudicate the merits.

Also pursuant to Local Civil Rule 65.1(d), Plaintiffs request that the Court schedule oral argument at the earliest practicable date and, if the Court finds it helpful, permit limited live witness testimony focused on the issue of irreparable harm in connection with the temporary restraining order and the subsequent request for preliminary injunctive relief.

Accordingly, Plaintiffs respectfully move this Court to enter a temporary restraining order and preliminary injunction as set forth above and to hold an expedited hearing on this Motion.

Respectfully submitted,  
/s/ **Gregory Alan Werkheiser, Bar No. VA210**  
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**/s/ Marion Forsyth Werkheiser, Bar No. 486465**

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