

**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.

**NOTIFICATION OF VOLUNTARY
WITHDRAWAL OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

DONALD J. TRUMP, et al.,

Defendants.

**NOTIFICATION OF VOLUNTARY WITHDRAWAL OF PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Pursuant to the Court's December 12, 2025 Minute Order, Plaintiffs hereby notify the Court that they voluntarily withdraw, without prejudice, their pending Motion for Temporary Restraining Order, Preliminary Injunction, and Expedited Hearing, ECF No. 7.

This withdrawal follows the Third Declaration of Andrew Heller ("Third Heller Declaration"), filed by Defendants on December 10, 2025. ECF No. 21-1. The Third Heller Declaration expands Defendants' commitments to refrain from planning and execution of certain activities related to the Eisenhower Executive Office Building. *Id.* ¶ 16. Specifically, Heller declares that the General Services Administration ("GSA") commits "to not issue solicitations for a contract, execute a contract, select a contractor, or draft design or construction drawings related to any power washing/cleaning, painting, and/or repointing of the exterior of the Eisenhower Executive Office Building prior to March 1, 2026." *Id.*

Plaintiffs' voluntary withdrawal relies on this expanded commitment and the expectation that the Court will be positioned to resolve the merits on an expedited basis under the Court's schedule as set forth in its December 12, 2025 Minute Order. Plaintiffs reserve all rights, including the right to seek emergency or preliminary injunctive relief should the circumstances materially change, including if actions occur contrary to Defendants' commitments or if additional developments create imminent risk of harm before the Court's merits resolution.

Date: December 12, 2025

Respectfully submitted,

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Pro Hac Vice Admission Pending

COUNSEL FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on Plaintiffs via CM/ECF electronic notice.

/s/ Marion Forsyth Werkheiser

MARION FORSYTH WERKHEISER

Attorney for Plaintiffs