

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

DC PRESERVATION LEAGUE, et al.,

Plaintiffs,

v.

**BOARD OF TRUSTEES OF THE JOHN F.
KENNEDY CENTER FOR THE
PERFORMING ARTS, et al.,**

Defendants.

Civil Action No. 1:26-cv-00981

MOTION FOR PRELIMINARY INJUNCTION

The defendants in this action—the Board of Trustees of the John F. Kennedy Center for the Performing Arts; Donald J. Trump, in his official capacity as Chair of the Board of the Trustees of the John F. Kennedy Center for the Performing Arts; Smithsonian Institution; National Park Service; United States Department of the Interior; Douglas J. Burgum, in his official capacity as Secretary of the Interior; United States Army Corps of Engineers; and National Capital Planning Commission (collectively, “Defendants”)—have announced, and commenced, a project involving the proposed demolition, new construction, major reconstruction, major renovation, or major aesthetic transformation of the historic Kennedy Center and its grounds (the “Project”). As explained in the memorandum accompanying this motion, the Project must comply with numerous federal statutes and regulations before it can proceed, yet has complied with none.

Pursuant to Federal Rule of Civil Procedure 65(a) and Local Civil Rule 65.1(c), plaintiffs DC Preservation League, National Trust for Historic Preservation in the United States, The American Institute of Architects, American Society of Landscape Architects, Docomomo US, Society of Architectural Historians, The Committee of 100 on the Federal City, and The Cultural Landscape Foundation (collectively, “Plaintiffs”) hereby move for an order preliminarily enjoining

the Defendants from further work on the Project unless and until they have complied with all federal laws and obtained all requisite permits and approvals. Plaintiffs request a hearing on their motion at the earliest practicable date, given Defendants' public announcement on March 16, 2026 of a two-year closure commencing on or about July 4, 2026, and the imminent risk of irreversible harm to the Kennedy Center's historic fabric and to the public's participatory rights. *See* Local Civil Rule 65.1(d).

Plaintiffs are likely to succeed on the merits of their claims, and the remaining factors—irreparable harm, balance of equities, and the public interest—all weigh heavily in their favor. Plaintiffs therefore respectfully request that the Court grant their motion; issue a preliminary injunction; and issue any further relief as the Court deems just and warranted.

Respectfully submitted,

DC PRESERVATION LEAGUE,
NATIONAL TRUST FOR HISTORIC PRESERVATION IN THE UNITED STATES,
THE AMERICAN INSTITUTE OF ARCHITECTS,
AMERICAN SOCIETY OF LANDSCAPE ARCHITECTS,
DOCOMOMO US,
SOCIETY OF ARCHITECTURAL HISTORIANS,
THE COMMITTEE OF 100 ON THE FEDERAL CITY, and
THE CULTURAL LANDSCAPE FOUNDATION

By their attorneys,

/s/ Thaddeus A. Heuer

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Dated: March 31, 2026

CERTIFICATE OF SERVICE

I certify that on March 31, 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 nonregistered participants.

/s/ Thaddeus A. Heuer _____