

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

_____)	
NATIONAL SECURITY ARCHIVE, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 20-3500-KBJ
)	
DONALD J. TRUMP, <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Rule 65 of the Federal Rules of Civil Procedure and LCvR 65.1, Plaintiffs in the above-captioned action hereby move the Court to enter a temporary restraining order requiring Defendants Donald J. Trump, the Executive Office of the President, and Jared Kushner to immediately preserve complete copies of all Presidential records generated during President Trump's term of office, and to immediately take all steps necessary to assume custody, ownership, and control over all Presidential records generated during President Trump's term of office, including but not limited to all material necessary to preserve a complete copy of any electronic message generated in a non-official electronic messaging account.

Plaintiffs respectfully request that the Court schedule a hearing on this motion at the Court's earliest convenience. As grounds for this motion, the Court is respectfully referred to the memorandum of points and authorities and the Declaration of Thomas S. Blanton filed with this motion. A proposed order is attached.

Dated: December 4, 2020

Respectfully submitted,

/s/ Anne L. Weismann

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