

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SHIRA PERLMUTTER,

*Plaintiff,*

v.

TODD BLANCHE *et al.*,

*Defendants.*

Case No. 1:25-cv-01659-TJK

**JOINT STATUS REPORT**

Pursuant to the Court's June 3, 2025 order, the parties have conferred and respectfully request that the Court enter the following briefing schedule for Plaintiff's motion for preliminary injunction:

- Plaintiff's motion for preliminary injunction: **June 10**
- Defendants' opposition to Plaintiff's motion: **June 24**
- Plaintiff's reply in support of motion: **July 1**
- Hearing on preliminary injunction: **The parties respectfully request that the Court schedule a hearing at its convenience for the week of July 7 or July 14-16.**

Dated: June 4, 2025

YAAKOV M. ROTH

Acting Assistant Attorney General

ERIC J. HAMILTON

Deputy Assistant Attorney General

CHRISTOPHER HALL

Assistant Branch Director  
Federal Programs Branch

Respectfully,

/s/ Allyson R. Scher

Brian D. Netter (D.C. Bar No. 979362)  
Allyson R. Scher (D.C. Bar No. 1616379)  
Democracy Forward Foundation  
P.O. Box 34553  
Washington, DC 20043  
(202) 448-9090  
bnetter@democracyforward.org  
ascher@democracyforward.org

/s/ Benjamin Hayes (by permission)

Benjamin Hayes  
Senior Counsel to the Assistant Attorney  
General  
U.S. Department of Justice, Civil Division  
950 Pennsylvania Avenue, NW  
Washington, DC 20530  
(202) 856-8207  
Benjamin.T.Hayes@usdoj.gov

*Counsel for Defendants*

Donald B. Verrilli, Jr. (D.C. Bar. No. 420434)  
Ginger D. Anders (D.C. Bar No. 494471)  
MUNGER, TOLLES & OLSON LLP  
601 Massachusetts Avenue, NW, Suite 500E  
Washington, D.C. 20001  
(202) 220-1100  
donald.verrilli@mto.com  
ginger.anders@mto.com

Kuruvilla J. Olasa (admitted pro hac vice)  
James R. Salzmänn (admitted pro hac vice)  
Miranda E. Rehaut (admitted pro hac vice)  
Adeel Mohammadi (admitted pro hac vice)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, California 90071  
(213) 683-9100  
kuruvilla.olasa@mto.com  
james.salzmänn@mto.com  
miranda.rehaut@mto.com  
adeel.mohammadi@mto.com

*Counsel for Plaintiff*