

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

MAYOR AND CITY COUNCIL OF
BALTIMORE, et al.,

Plaintiffs,

vs.

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Defendants.

Case No. 25-cv-458-ABA

PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs Mayor and City Council of Baltimore and Economic Action Maryland Fund hereby move for a temporary restraining order enjoining the Consumer Financial Protection Bureau and its Acting Director Russell Vought from taking any steps to defund the Consumer Financial Protection Bureau, including by transferring the Bureau's reserve funds or otherwise using them for a purpose other than the operation of the Bureau, until this Court can further consider the merits. As set forth in more detail in the accompanying brief, CFPB's final agency action to defund the Bureau violates the Administrative Procedure Act because it is arbitrary and capricious and without basis in statutory authority. Plaintiffs will suffer imminent injury absent injunctive relief. Plaintiffs respectfully request an emergency hearing on this motion at the Court's earliest convenience.

Within five minutes of filing the complaint in this matter, counsel for Plaintiffs e-mailed the three Assistant Directors for the Federal Programs Branch of the Department of Justice to provide actual notice that they had filed a complaint in this matter (attaching a

copy of the complaint) and would be filing this instant temporary restraining order later this same day. Immediately prior to making this application to the Court, counsel for Plaintiffs provided the three Assistant Directors for the Federal Programs Branch with electronic copies of this motion for temporary restraining order and accompanying brief, declarations, and proposed order via e-mail before completing this electronic filing.

Dated: February 12, 2025

Respectfully submitted,

/s/ Mark B. Samburg

Mark B. Samburg

Kevin E. Friedl*

Daniel McGrath*

Jessica Anne Morton*

J. Sterling Moore*

Robin F. Thurston*

Skye L. Perryman*

Democracy Forward Foundation

P.O. Box 34553

Washington, DC 20043

(202) 448-9090

msamburg@democracyforward.org

kfriedl@democracyforward.org

dmcgrath@democracyforward.org

jmorton@democracyforward.org

smoore@democracyforward.org

rthurston@democracyforward.org

sperryman@democracyforward.org

Counsel for Plaintiffs

**Pro hac vice application pending*