UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MICHAEL ABRAMOWITZ, et al.,

Plaintiffs,

v.

KARI LAKE,

Senior Advisor to the Acting CEO of the United States Agency for Global Media, et al.,

Defendants.

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE,

Senior Advisor to the Acting CEO of the United States Agency for Global Media, et al.,

Defendants.

Civil Action No. 25-0887 (RCL)

Civil Action No. 25-1015 (RCL)

DEFENDANTS' RESPONSE TO THE COURT'S JULY 30, 2025, ORDER TO SHOW CAUSE

Defendants, by and through counsel, respectfully submit this response to the Court's July 30, 2025, Order to Show Cause. The Court ordered Defendants to explain how, since April 22, they have complied with the third prong of the preliminary injunction; provide additional information as to United States Agency for Global Media's personnel and staffing; produce all documents reflecting Defendants' plan to restore Voice of America and plans for further termination of USAGM staff; and produce all documents relating to Defendants' plans to wind

down Global Media's operation. In response to the Court's order, Defendants provide the attached documents (Exhibit 1) and the supplemental Declaration of Kari Lake, appended hereto.

For these reasons, and those reasons previously provided, Defendants have been complying, and continue to comply, in good faith with the third prong of the Court's April 22, 2025, injunction. Defendants also respectfully request and reserve the right to amend, alter, and supplement this response as the facts and circumstances become known to them through the course of the litigation.

Dated: August 13, 2025 Respectfully submitted,

JEANINE FERRIS PIRRO United States Attorney

By: /s/ Stephanie R. Johnson

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