

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

PATSY WIDAKUSWARA, et al.,

Plaintiffs,

v.

KARI LAKE, Senior Advisor to the Acting  
CEO of U.S. Agency for Global Media, et al.,

Defendants.

Case No. 1:25-cv-1015-RCL

Case No. 1:25-cv-0887-RCL

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

v.

KARI LAKE, Senior Advisor to the Acting  
CEO of U.S. Agency for Global Media, et al.,

Defendants.

**NOTICE**

Defendants hereby notify the Court of initial steps taken pursuant to its latest order and updates responsive to the Court's Order to Show Cause, No. 25-cv-1015-RCL, ECF No. 130.

On August 25, 2025, the Court entered an order "that Kari Lake, Frank Wuco, and Leili Soltani shall sit for depositions to be taken by the plaintiffs no later than September 15, 2025." ECF No. 72 at 1. The Court further ordered that "the parties shall meet and confer to set a schedule for the foregoing depositions; and should the parties fail to agree on a schedule, they shall jointly and expeditiously move to set a scheduling conference for that purpose." *Id.* at 2. The Court indicated it would "hold in abeyance any ruling on further coercive action." *Id.* at 2.

This morning, Counsel for Defendants became aware that yesterday USAGM notified relevant unions with copies of annotated retention registers to be used to issue specific notices to affected bargaining unit employees regarding reduction in force and transfer of function. Counsel for Defendants are currently working to redact personally identifying information in the registers and will file the redacted registers as soon as possible but no later than today.

Defendants further notify that the Court that counsel for Defendants are scheduled to meet and confer with counsel for Plaintiffs on Thursday August 28th, 2025 at 10am.

Dated: August 26, 2025

Washington DC

Respectfully submitted,

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