

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

PATSY WIDAKUSWARA, *et al.*,

Plaintiffs,

–v.–

KARI LAKE *et al.*,

Defendants.

Case No. 25-cv-1015-RCL

MICHAEL ABRAMOWITZ *et al.*,

Plaintiffs,

–v.–

KARI LAKE *et al.*,

Defendants.

Case No. 25-cv-00887-RCL

PLAINTIFFS’ MOTION FOR JUDICIAL AVAILABILITY DURING DEPOSITIONS

Plaintiffs in the above-captioned actions write jointly to respectfully request that the Court or a Magistrate Judge be available to resolve any disputes that may arise during the upcoming depositions of Defendant Kari Lake and Defendants’ witnesses, Leli Soltani and Frank Wuco. Defendants take no position on this request.

On July 30, 2025, the Court granted Plaintiffs’ motions for an Order to Show Cause. *See Widakuswara* Dkt. 130, *Abramowitz* Dkt. 62 (“OSC”). After Defendants responded to the Order to Show Cause, Plaintiffs filed a response detailing Defendants’ continuing failure to comply with the Court’s orders requiring Defendants to produce specific information and documents reflecting their plan to operate Voice of America (“VOA”) consistent with the preliminary injunction and

USAGM's governing statutes. *See Widakuswara* Dkt. 136; *Abramowitz* Dkt. 70. Plaintiffs also requested that the Court allow Plaintiffs to conduct "fast-tracked depositions of no more than three of Defendants' declarants, concerning compliance with Part III of the preliminary injunction and the matters discussed in those declarants' declarations." *Widakuswara* Dkt. 136 at 9; *Abramowitz* Dkt. 70 at 9. On August 25, 2025, the Court held a hearing and granted Plaintiffs' request to take depositions of Ms. Lake, Ms. Soltani, and Mr. Wuco by September 15, 2025. *See Widakuswara* Dkt. 137; *Abramowitz* Dkt. 72. In a subsequent written Order, the Court explained that it was ordering the depositions because Defendants had failed to "explain how they are in compliance with the Court's preliminary injunction" and the depositions would "allow the defendants one final opportunity, short of a contempt trial, to provide such explanation." *Widakuswara*, Dkt. 137 at 2; *Abramowitz*, Dkt. 72 at 2. The parties then scheduled the depositions for September 9 (Ms. Lake), September 11 (Ms. Soltani), and September 18 (Mr. Wuco), starting at 10:00 a.m.

As the Court has noted, throughout this litigation, Defendants have "provide[d] cagey answers and omit[ted] key information" in response to the Court's orders requiring Defendants to provide details regarding "VOA's current operations [and] future plans," even after the Court "directl[ly] command[ed]" Defendants "to provide complete information on VOA's future operational capacity and staffing levels." OSC at 2-3. In light of Defendants' history of providing evasive answers to the Court regarding the same subjects that will be explored at the upcoming depositions and the time-sensitive nature of these proceedings, there is good cause to believe that disputes may arise during the depositions that the parties will not be able to resolve without judicial intervention. Accordingly, Plaintiffs respectfully request that the Court enter an order providing that the Court will make itself available or assign a Magistrate Judge to be available by telephone

to resolve any urgent disputes that may arise—and the parties are unable to resolve—during the upcoming depositions.

We thank the Court for its consideration of this request.

Respectfully submitted,

Dated: September 8, 2025

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** The views expressed herein do not purport to represent the institutional views of Yale Law School, if any.