

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

SUSMAN GODFREY LLP,

Plaintiff,

v.

EXECUTIVE OFFICE OF THE
PRESIDENT, *et al.*,

Defendants.

Civil Case No.: 1:25-cv-01107
Judge Loren L. AliKhan

**DECLARATION OF GINGER D. ANDERS IN SUPPORT OF
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

1. I am an attorney in the law firm of Munger, Tolles & Olson LLP and a member of the Bar of this Court. I am one of the counsel of record in the above-captioned action representing Plaintiff Susman Godfrey LLP. I submit this declaration in support of Plaintiff's Motion for Summary Judgment.

2. I am over the age of 18 and competent to make this declaration. I have personal knowledge of the facts set forth in this declaration and, if called and sworn as a witness, could and would competently testify to them.

3. Attached hereto as **Exhibit 1** is a true and correct copy of an April 9, 2025 Executive Order Number 14263 issued by President Donald J. Trump titled "Addressing Risks From Susman Godfrey," as downloaded from the Federal Register, Vol. 90, No. 71, at <https://tinyurl.com/ab9ap9j>.

4. Attached hereto as **Exhibit 2** is a true and correct copy of an April 9, 2025 White House Fact Sheet titled "Fact Sheet: President Donald J. Trump Addresses Risks From Susman Godfrey," as downloaded from the White House's website at <https://tinyurl.com/yck4rf3b>.

5. Attached hereto as **Exhibit 3** is a true and correct copy of a 2024 document from the U.S. Department of Justice titled “Fraud Statistics – Overview,” as downloaded from the U.S. Department of Justice’s website at <https://tinyurl.com/3aydk94u>.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a document from the Federal Election Commission titled “Official 2020 Presidential General Election Results,” as downloaded from the Federal Election Commission’s website at <https://tinyurl.com/4947k65c>.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a November 13, 2020 post on X by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from X’s website at <https://tinyurl.com/3w38wk4m>.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a December 15, 2020 post on X by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from X’s website at <https://tinyurl.com/42byah5j>.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a December 16, 2020 post on X by user @realMikeLindell, which upon information and belief is an account owned by Mr. Mike Lindell, as downloaded from X’s website at <https://tinyurl.com/48sdasjm>.

10. Attached hereto as **Exhibit 8** is a true and correct copy of an April 19, 2023 article by Marshall Cohen and Oliver Darcy titled “Fox News settles with Dominion at the last second, pays more than \$787 million to avert defamation trial over its 2020 election lies,” as published by *CNN*, and as downloaded from *CNN*’s website at <https://tinyurl.com/2rx7kxyu>.

11. Attached hereto as **Exhibit 9** is a true and correct copy of an April 18, 2023 article by Catherine Thorbecke et al., titled “Settlement reached in Dominion defamation lawsuit against Fox News,” as published by *CNN*, and as downloaded from *CNN*’s website at <https://tinyurl.com/83nctedj>.

12. Attached hereto as **Exhibit 10** is a true and correct copy of a February 25, 2025 Presidential Memorandum titled “Suspension of Security Clearances and Evaluation of Government Contracts,” as downloaded from the White House’s website at <https://tinyurl.com/3sya6kc5>.

13. Attached hereto as **Exhibit 11** is a true and correct copy of a January 14, 2025 article by Alanna Durkin Richer et al., titled “Special counsel report says Trump would’ve been convicted for Jan. 6 ‘unprecedented criminal effort,’” as published by the *Associated Press*, and as downloaded from the *Associated Press*’s website at <https://tinyurl.com/4dc8j4fp>.

14. Attached hereto as **Exhibit 12** is a true and correct copy of a March 6, 2025 Executive Order Number 14230 issued by President Donald J. Trump titled “Addressing Risks From Perkins Coie LLP,” as downloaded from the Federal Register, Vol. 90, No. 46, at <https://tinyurl.com/y4ntkhuh>.

15. Attached hereto as **Exhibit 13** is a true and correct copy of a March 11, 2025 document filed by Perkins Coie titled “Complaint,” as downloaded from the docket for *Perkins Coie LLP v. U.S. Department of Justice*, 25-cv-716 (D.D.C. Mar. 11, 2025), ECF No. 1.

16. Attached hereto as **Exhibit 14** is a true and correct copy of a March 12, 2025 order from this Court granting Perkins Coie’s Motion for a Temporary Restraining Order, as downloaded from the docket for *Perkins Coie LLP v. U.S. Department of Justice*, 25-cv-716 (D.D.C. Mar. 12, 2025), ECF No. 21.

17. Attached hereto as **Exhibit 15** is a true and correct copy of a March 12, 2025 post on X by user @StephenM, which upon information and belief is an account owned by Mr. Stephen Miller, as downloaded from X’s website at <https://tinyurl.com/58rp47up>.

18. Attached hereto as **Exhibit 16** is a true and correct copy of a March 14, 2025 Executive Order Number 14237 issued by President Donald J. Trump titled “Addressing Risks From Paul Weiss,” as downloaded from the Federal Register, Vol. 90, No. 53, at <https://tinyurl.com/2cxyfs8j>.

19. Attached hereto as **Exhibit 17** is a true and correct copy of a March 20, 2025 post on Truth Social by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from Truth Social's website at <https://tinyurl.com/2ecytsmm>.

20. Attached hereto as **Exhibit 18** is a true and correct copy of a March 21, 2025 Executive Order 14244 issued by President Donald J. Trump titled "Addressing Remedial Action by Paul Weiss," as downloaded from the Federal Register, Vol. 90, No. 57, at <https://tinyurl.com/4ctykxfd>.

21. **Exhibit 19** is intentionally omitted.

22. Attached hereto as **Exhibit 20** is a true and correct copy of a March 22, 2025 Presidential Memorandum issued by President Donald J. Trump titled "Preventing Abuses of the Legal System and the Federal Court," as downloaded from the White House's website at <https://tinyurl.com/2xffvr6c>.

23. Attached hereto as **Exhibit 21** is a true and correct copy of a March 25, 2025 Executive Order 14246 issued by President Donald J. Trump titled "Addressing Risks From Jenner & Block," as downloaded from the Federal Register, Vol. 90, No. 59, at <https://tinyurl.com/5cjspjek>.

24. Attached hereto as **Exhibit 22** is a true and correct copy of a March 28, 2025 document filed by Jenner & Block titled "Complaint," as downloaded from the docket for *Jenner & Block LLP v. U.S. Department of Justice*, No. 25-cv-916 (D.D.C. Mar. 28, 2025), ECF No. 1.

25. Attached hereto as **Exhibit 23** is a true and correct copy of a March 28, 2025 order from this Court granting Jenner & Block's Motion for a Temporary Restraining Order, as downloaded from the docket for *Jenner & Block LLP v. U.S. Department of Justice*, No. 1:25-cv-916 (D.D.C. Mar. 28, 2025), ECF No. 9.

26. Attached hereto as **Exhibit 24** is a true and correct copy of a document filed by the United States on April 8, 2025 titled “Memorandum for Head of Executive Departments and Agencies,” as downloaded from the docket for *Jenner & Block LLP v. U.S. Department of Justice*, No. 1:25-cv-916 (D.D.C. Apr. 8, 2025), ECF No. 21-1.

27. Attached hereto as **Exhibit 25** is a true and correct copy of a March 27, 2025 Executive Order 14250 issued by President Donald J. Trump titled “Addressing Risks From WilmerHale,” as downloaded from the Federal Register, Vol. 90, No. 63, at <https://tinyurl.com/342z228u>.

28. Attached hereto as **Exhibit 26** is a true and correct copy of a March 28, 2025 document filed by WilmerHale titled “Complaint,” as downloaded from the docket for *Wilmer Cutler Pickering Hale and Dorr LLP v. Exec. Office of the President*, No. 25-cv-917 (D.D.C. Mar. 28, 2025), ECF No. 1.

29. Attached hereto as **Exhibit 27** is a true and correct copy of a March 28, 2025 order from this Court granting in part and denying in part WilmerHale’s Motion for a Temporary Restraining Order, as downloaded from the docket for *Wilmer Cutler Pickering Hale and Door LLP v. Exec. Office of the President*, 25-cv-917 (D.D.C. Mar. 28, 2025), ECF No. 10.

30. Attached hereto as **Exhibit 28** is a true and correct copy of a March 6, 2025 video from *C-SPAN* titled “President Trump Signs Executive Orders,” as downloaded from *C-SPAN*’s website at <https://tinyurl.com/3w7jumn4>.

31. Attached hereto as **Exhibit 29** is a true and correct copy of a March 9, 2025 article by Erin Mulvaney and C. Ryan Barber titled “Fear of Trump Has Elite Law Firms in Retreat,” as published in the *Wall Street Journal*, and as downloaded from the *Wall Street Journal*’s website at <https://tinyurl.com/23p4ne2w>.

32. Attached hereto as **Exhibit 30** is a true and correct copy of a March 14, 2025 transcript titled “Speech: Donald Trump Addresses the Staff at the Department of Justice – March 14, 2025,” as published by *Roll Call*, and as downloaded from *Roll Call*’s website at <https://tinyurl.com/48s25tb4>.

33. Attached hereto as **Exhibit 31** is a true and correct copy of an April 10, 2025 video titled “Trump Signs New Executive Order Targeting Law Firm Susman Godfrey,” as published by *Forbes*, and as downloaded from YouTube’s website at <https://tinyurl.com/4cj3ccr6>.

34. Attached hereto as **Exhibit 32** is a true and correct copy of a March 13, 2025 article by Media Matters Staff titled “Steve Bannon: ‘There’s major law firms in Washington, D.C.’ and ‘what we are trying to do is put you out of business and bankrupt you,’” as published by *MediaMatters For America*, and as downloaded from *MediaMatters For America*’s website at <https://tinyurl.com/3tt4dmnm>.

35. Attached hereto as **Exhibit 33** is a true and correct copy of a March 28, 2025 post on Truth Social by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from Truth Social’s website at <https://tinyurl.com/bdcvadxx>.

36. Attached hereto as **Exhibit 34** is a true and correct copy of a March 28, 2025 article by Daniel Barnes titled “Major law firm strikes preemptive deal with White House,” as published in *Politico*, and as downloaded from *Politico*’s website at <https://tinyurl.com/mvv9ubmz>.

37. Attached hereto as **Exhibit 35** is a true and correct copy of an April 1, 2025 post on Truth Social by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from Truth Social’s website at <https://tinyurl.com/382dx45m>.

38. Attached hereto as **Exhibit 36** is a true and correct copy of an April 1, 2025 article by Patrick Smith and Abigail Adcox titled “Willkie Believes It’s the Next Target of Trump Executive

Order,” as published in *The American Lawyer*, and as downloaded from *The American Lawyer*’s website at <https://tinyurl.com/3pywbjx8>.

39. Attached hereto as **Exhibit 37** is a true and correct copy of an April 2, 2025 post on Truth Social by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from Truth Social’s website at <https://tinyurl.com/ycmrsb44>.

40. Attached hereto as **Exhibit 38** is a true and correct copy of an April 2, 2025 article by Meghan Tribe titled “Milbank Signs Deal With Trump to Avoid Executive Order,” as published by *Bloomberg Law*, and as downloaded from *Bloomberg Law*’s website at <https://tinyurl.com/3m5t7uz2>.

41. Attached hereto as **Exhibit 39** is a true and correct copy of an April 8, 2025 video by the White House titled “President Trump Participates in an Unleashing American Energy Executive Order Signing Event,” as downloaded from YouTube’s website at <https://tinyurl.com/mr7vmnfh>.

42. Attached hereto as **Exhibit 40** is a true and correct copy of an April 11, 2025 post on Truth Social by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from Truth Social’s website at <https://tinyurl.com/5sehrehk>.

43. Attached hereto as **Exhibit 41** is a true and correct copy of an April 11, 2025 post on Truth Social by user @realDonaldTrump, which upon information and belief is an account owned by President Donald J. Trump, as downloaded from Truth Social’s website at <https://tinyurl.com/3whcpdjd>.

44. Attached hereto as **Exhibit 42** is a true and correct copy of an April 11, 2025 article by Mike Scarcella, Sara Merken, and David Thomas titled “Law firm targeted by Trump sues as five other top firms make deals,” and published in *Reuters*, as downloaded from *Reuters*’s website at <https://tinyurl.com/256mym35>.

45. Attached hereto as **Exhibit 43** is a true and correct copy of an April 8, 2025 article by Roy Strom titled “Trump Says He’ll Enlist Big Law Dealmakers for Coal, Tariffs,” as published in *Bloomberg Law*, and as downloaded from *Bloomberg Law*’s website at <https://tinyurl.com/yyn85m2u>.

46. Attached hereto as **Exhibit 44** is a true and correct copy of an April 4, 2025 document titled “Brief of *Amici Curiae* 504 Law Firms in Support of Plaintiff’s Motion for Summary Judgment and For Declaratory and Permanent Injunction,” as downloaded from the docket for *Perkins Coie LLP v. U.S. Department of Justice*, 25-cv-716 (D.D.C. Apr. 4, 2025), ECF No. 63-1.

47. Attached hereto as **Exhibit 45** is a true and correct copy of an April 8, 2025 document titled “Brief of Former Senior Government Officials As *Amici Curiae* in Support of Plaintiff’s Motion for Summary Judgment and for Declaratory and Permanent Injunctive Relief,” as downloaded from the docket for *Perkins Coie LLP v. U.S. Department of Justice*, 25-cv-716 (D.D.C. Apr. 8, 2025), ECF No. 104.

48. Attached hereto as **Exhibit 46** is a true and correct copy of a transcript of an April 15, 2025 hearing before this Court titled “Transcript of Motion Hearing Before the Honorable Loren L. AliKhan United States District Court Judge,” as located on the docket for *Susman Godfrey LLP v. Exec. Office of the President*, No. 25-cv-1107 (D.D.C. Apr. 15, 2025), ECF No. 19.

49. Attached hereto as **Exhibit 47** is a true and correct copy of a page from Susman Godfrey LLP’s website titled “The Susman Godfrey Prize,” as downloaded from Susman Godfrey LLP’s website at <https://tinyurl.com/4j6wn3w7>.

50. Attached hereto as **Exhibit 48** is a true and correct copy of an April 16, 2025 email from the United States Deputy Associate Attorney General Richard P. Lawson with the subject line “Temporary Restraining Order / Notification Requirement,” as downloaded from the docket for *Susman Godfrey LLP v. Exec. Office of the President*, No. 25-cv-1107 (D.D.C. Apr. 16, 2025), ECF No. 28-1.

51. Attached hereto as **Exhibit 49** is a true and correct copy of an April 2, 2025 document filed by Perkins Coie titled “Declaration of David J. Burman in Support of Motion for Summary Judgment,” as downloaded from the docket for *Perkins Coie LLP v. U.S. Department of Justice*, No. 25-cv-716 (D.D.C. Apr. 2, 2025), ECF No. 39-3.

52. Attached hereto as **Exhibit 50** is a true and correct copy of a March 28, 2025 document filed by WilmerHale titled “Declaration of Bruce M. Berman in Support of Plaintiff’s Motion for Temporary Restraining Order and Preliminary Injunction,” as downloaded from the docket for *Wilmer Cutler Pickering Hale and Dorr LLP v. Exec. Office of the President*, No. 25-cv-917 (D.D.C. Mar. 28, 2025), ECF No. 3-2.

53. Attached hereto as **Exhibit 51** is a true and correct copy of a March 28, 2025 declaration by Thomas J. Perrelli titled “Declaration Of Thomas J. Perrelli In Support Of Motion For Temporary Restraining Order,” as downloaded from the docket for *Jenner & Block LLP v. U.S. Department of Justice*, No. 1:25-cv-916 (D.D.C. Mar. 28, 2025), ECF No. 2-16.

54. Attached hereto as **Exhibit 52** is a true and correct copy of a March 25, 2025 article by Michael Birnbaum titled “Law firms refuse to represent Trump opponents in the wake of his attacks,” as published in the *Washington Post*, and as downloaded from the *Washington Post*’s website at <https://tinyurl.com/yn563p6x>.

55. Attached hereto as **Exhibit 53** is a true and correct copy of a March 27, 2025 article by Katelyn Polantz titled “Law firms are scared to speak out amid Trump’s attacks on their livelihood,” as published by *CNN*, and as downloaded from *CNN*’s website at <https://tinyurl.com/2rd8dwem>.

56. Attached hereto as **Exhibit 54** is a true and correct copy of an April 13, 2025 article by Ryan Lucas titled “Trump attacks on law firms begin to chill pro bono work on causes he doesn’t like,” as published by *NPR*, and as downloaded from *NPR*’s website at <https://tinyurl.com/25ev4x7k>.

57. Attached hereto as **Exhibit 55** is a true and correct copy of an April 8, 2025 article by Matthew Goldstein titled “Two Law Firms File for Permanent Relief from Trump’s Executive Orders,” as published in the *New York Times*, and as downloaded from the *New York Times*’s website at <https://tinyurl.com/38vrtprx>.

58. Attached hereto as **Exhibit 56** is a true and correct copy of a March 11, 2025 document filed by Perkins Coie titled “Declaration of David J. Burman in Support of Motion for Temporary Restraining Order,” as downloaded from the docket for *Perkins Coie LLP v. U.S. Department of Justice*, No. 25-cv-716 (D.D.C. Mar. 11, 2025), ECF No. 2-2.

59. Attached hereto as **Exhibit 57** is a true and correct copy of a March 19, 2025 document filed by Roberto Finzi titled “Memorandum in Support of Motion to Withdraw as Counsel for Defendant Steven Schwartz,” as downloaded from the docket for *United States v. Coburn*, No. 19-120 (D.N.J. Mar. 19, 2025), ECF No. 1012-1.

60. Attached hereto as **Exhibit 58** is a true and correct copy of an April 8, 2025 document filed by Jenner & Block titled “Declaration of Thomas J. Perrelli in Support of Plaintiff Jenner & Block LLP’s Motion for Summary Judgment and for Declaratory and Permanent Injunctive Relief,” as downloaded from the docket for *Jenner & Block LLP v. U.S. Department of Justice, et al.*, No. 25-cv-916 (D.D.C. Apr. 8, 2025), ECF No. 19-30.

61. Attached hereto as **Exhibit 59** is a true and correct copy of an April 8, 2025 document filed by WilmerHale titled “Supplemental Declaration of Bruce M. Berman in Support of Plaintiff’s Motion for Summary Judgment and Declaratory and Permanent Injunctive Relief,” as downloaded from the docket for *Wilmer Cutler Pickering Hale and Dorr LLP v. Exec. Office of the President*, No. 25-cv-917 (D.D.C. Apr. 8, 2025), ECF No. 16-3.

62. Attached hereto as **Exhibit 60** is a true and correct copy of a March 19, 2025 article by Richard Vanderford titled “Law Firm in Trump’s Crosshairs Fired by White-Collar Client,” as published by *The Wall Street Journal*, and as downloaded from *The Wall Street Journal*’s website at <https://tinyurl.com/ym7k2mv7>.

63. Attached hereto as **Exhibit 61** is a true and correct copy of an April 16, 2025 article by Michael S. Schmidt et al., titled “Law Firms Made Deals With Trump. Now He Wants More From Them,” as published by the *New York Times*, and as downloaded from the *New York Times*’s website at <https://tinyurl.com/2yxscs66>.

64. Attached hereto as **Exhibit 62** is a true and correct copy of an April 19, 2025 article by Noam Scheiber titled “Why Big Law Firms Aren’t Standing Together Against Trump’s Assault,” as published by the *New York Times*, and as downloaded from the *New York Times*’s website at <https://tinyurl.com/24pj8m45>.

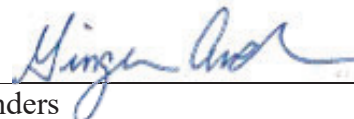
65. Attached hereto as **Exhibit 63** is a true and correct copy of a transcript of a March 12, 2025 hearing before this Court titled “Transcript of Hearing Before the Honorable Beryl A. Howell, United States District Court Senior Judge,” as located on the docket for *Perkins Coie LLP v. U.S. Department of Justice*, No. 25-cv-716 (D.D.C. Mar. 12, 2025), ECF No. 22.

66. Attached hereto as **Exhibit 64** is a true and correct copy of a transcript of a March 28, 2025 hearing before this Court titled “Transcript of Motion Hearing Before the Honorable John D. Bates United States District Judge,” as located on the docket for *Jenner & Block LLP v. U.S. Department of Justice, et al.*, No. 25-cv-916 (D.D.C. Mar. 28, 2025), ECF No. 10.

67. Attached hereto as **Exhibit 65** is a true and correct copy of a transcript of a March 28, 2025 hearing before this Court titled “Transcript of Motion Hearing on TRO Proceedings Before the Honorable Richard J. Leon United States Senior District Judge,” as located on the docket for *Wilmer*

Cutler Pickering Hale and Dorr LLP v. Exec. Office of the President, No. 25-cv-917 (D.D.C. Mar. 28, 2025), ECF No. 11.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on April 23, 2025, in Washington, District of Columbia.



Ginger D. Anders
D.C. Bar No. 494471