UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, et al.,

Plaintiffs,

v.

Civil Action No. 25-0946 (CKK)

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

Defendants.

DEMOCRATIC NATIONAL COMMITTEE, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*,

Defendants.

Civil Action No. 25-0952 (CKK)

LEAGUE OF WOMEN VOTERS EDUCATION FUND, et al.,

Plaintiffs,

v.

Civil Action No. 25-0955 (CKK)

DONALD J. TRUMP, in his official capacity as President of the United States, *et al.*,

Defendants.

LEAGUE AND LULAC PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule 7(h), Plaintiffs League of Women Voters Education Fund, League of Women Voters of the United States, League of Women Voters of Arizona, Hispanic Federation, National Association for the Advancement of Colored People, OCA-Asian Pacific American Advocates, and Asian and Pacific Islander American Vote ("League Plaintiffs") and Plaintiffs League of United Latin American Citizens, Secure Families Initiative, and Arizona Students' Association ("LULAC Plaintiffs") (collectively "Nonpartisan Plaintiffs") respectfully move for partial summary judgment against Defendants Donald J. Trump (in his official capacity as President of the United States), Executive Office of the President, United States Election Assistance Commission ("EAC"), Donald L. Palmer (in his official capacity as Chairman and a Commissioner of the EAC), Thomas Hicks (in his official capacity as Vice Chair and a Commissioner of the EAC), Christy McCormick and Benjamin W. Hovland (in their official capacities as Commissioners of the EAC), and Brianna Schletz (in her official capacity as Executive Director of the EAC) ("Defendants"). 1 Nonpartisan Plaintiffs respectfully move for declaratory relief against all Defendants, and move to permanently enjoin Defendants EAC, Palmer, Hicks, McCorrack, Hovland, and Schletz from implementing Section 2(a) of President Trump's March 25, 2025 Executive Order 14,248.

As set forth in the accompanying Memorandum in Support of Partial Summary Judgment, Nonpartisan Plaintiffs are entitled to summary judgment on their claims that Section 2(a) of President Trump's March 25, 2025, Executive Order No. 14248 is unconstitutional because there is no genuine dispute as to any material fact and Nonpartisan Plaintiffs are entitled to judgment as a matter of law.

The grounds for this Motion are fully set forth in the accompanying Memorandum in Support. A Statement of Undisputed Material Facts, Plaintiffs' Exhibits, and a Proposed Order are filed herewith.

¹ The League Plaintiffs challenge only Section 2(a) and therefore respectfully request that the Court enter final judgment in their favor.

Dated: July 11, 2025

Wendy R. Weiser*
Sean Morales-Doyle*
Eliza Sweren-Becker*
Jasleen K. Singh*
Andrew B. Garber*
BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
(646) 292-8310
weiserw@brennan.law.nyu.edu
morales-doyles@brennan.law.nyu.edu
sweren-beckere@brennan.law.nyu.edu
singhj@brennan.law.nyu.edu
garbera@brennan.law.nyu.edu

Leah C. Aden*
John S. Cusick*
Brenda Wright*
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
(212) 965-2200
laden@naacpldf.org
jcusick@naacpldf.org
bwright@naacpldf.org

Miranda Galindo*
Cesar Z. Ruiz*
Delmarie Alicea*
LATINO JUSTICE PRLDEF
475 Riverside Drive, Suite 1901
New York, NY 10115
(212) 392-4752
mgalindo@latinojustice.org
cruiz@latinojustice.org
dalicea@latinojustice.org

Niyati Shah (D.C. Bar No. 1659560) Alizeh Ahmad (D.C. Bar No. 90018919) ASIAN AMERICANS ADVANCING JUSTICE-AAJC 1620 L Street, NW, Suite 1050 Washington, D.C. 20036 Respectfully submitted,

/s/ Sophia Lin Lakin Sophia Lin Lakin* Ethan Herenstein* Jonathan Topaz* Clayton Pierce* Davin Rosborough* AMERICAN CIVIL LIBERTIES UNION **FOUNDATION** 125 Broad St., 18th Floor New York, NY 10004 (212) 549-2500 slakin@aclu.org eherenstein@aclu.org jtopaz@aclu.org cpierce@aclu.org drosborough@aclu.org

Megan C. Keenan (D.C. Bar No. 1672508)
Sarah Brannon (D.C. Bar No. 90024493)
Adriel I Cepeda Derieux (D.C. Bar No. 90026636)
Jacob Van Leer (DC Bar No. 1742196)
AMERICAN CIVIL LIBERTIES UNION FOUNDATION
915 15th St. NW
Washington, DC 20001
(740) 632-0671
mkeenan@aclu.org
sbrannon@aclu.org
acepedaderieux@aclu.org
jvanleer@aclu.org

Michael Perloff (D.C. Bar No. 1601047) Scott Michelman (D.C. Bar No. 1006945) AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF THE DISTRICT OF COLUMBIA 529 14th Street NW, Suite 722 Washington, D.C. 20045 (202) 457-0800 mperloff@acludc.org smichelman@acludc.org

Counsel for Plaintiffs League of Women Voters Education Fund, League of Women Voters of the United States, League of Women Voters of (202) 296-2300 nshah@advancingjustice-aajc.org aahmad@advancingjustice-aajc.org Arizona, Hispanic Federation, National Association for the Advancement of Colored People, OCA-Asian Pacific American Advocates, and Asian and Pacific Islander American Vote

*Admitted pro hac vice

/s/ Norman L. Eisen
Norman L. Eisen (D.C. Bar No. 435051)
Tianna J. Mays (D.C. Bar No. 90005882)
Pooja Chaudhuri (D.C. Bar No. 888314523)
Sofia Fernandez Gold (D.C. Bar No. 90010196)
DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE #15180
Washington, D.C. 20003
(202) 601-8678
norman@statedemocracydefenders.org
tianna@statedemocracydefenders.org
pooja@statedemocracydefenders.org
sofia@statedemocracydefenders.org

Counsel for Plaintiffs League of United Latin American Citizens, Secure Families Initiative, and Arizona Students Association /s/ Danielle Lang Danielle Lang (DC Bar No. 1500218) Jonathan Diaz (DC Bar No. 1613558) Robert Brent Ferguson (DC Bar No. 1782289) Anna Baldwin (DC Bar No. 998713) Heather Szilagyi (DC Bar No. 90006787) Benjamin Phillips (DC Bar No. 90005450) CAMPAIGN LEGAL CENTER 1101 14th St. NW, Suite 400 Washington, D.C. 20005 (202) 736-2200 dlang@campaignlegalcenter.org idiaz@campaignlegalcenter.org bferguson@campaignlegalcenter.org abaldwin@campaignlegalcenter.org hszilagyi@campaignlegalcenter.org bphillips@campaignlegalcenter.org