

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

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

EXECUTIVE OFFICE OF THE PRESIDENT,
et al.,

Defendants.

Civil Action No. 25-0946 (CKK)

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.

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

Defendants.

Civil Action No. 25-0955 (CKK)

**LEAGUE¹ AND LULAC² PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

¹ 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.

² Plaintiffs League of United Latin American Citizens, Secure Families Initiative, and Arizona Students’ Association.

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, 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”) respectfully move for a preliminary injunction against Defendants 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”). League and LULAC Plaintiffs respectfully move to preliminarily enjoin Defendants EAC, Palmer, Hicks, McCormick, Hovland, and Schletz from implementing Section 2(a) of President Trump’s March 25, 2025 Executive Order No. 14248.

As set forth in the accompanying Memorandum in Support of Motion for Preliminary Injunction, League and LULAC Plaintiffs are entitled to a preliminary injunction because they are likely to succeed on the merits of their claims, they are suffering and will continue to suffer irreparable injury in the absence of the requested relief, the balance of equities tips in their favor, and the issuance of the injunction is in the public interest.

The grounds for this Motion are fully set forth in the accompanying Memorandum in Support, and a Proposed Order is attached.

STATEMENT PURSUANT TO LOCAL CIVIL RULE 7(m)

Local Rule 7(m) provides that, “[b]efore filing any nondispositive motion in a civil action, counsel shall discuss the anticipated motion with opposing counsel in a good-faith effort to determine whether there is any opposition to the relief sought and, if there is, to narrow the areas of disagreement.” League and LULAC Plaintiffs have conferred with Defendants about this

Motion. Defendants oppose the Motion. League and LULAC Plaintiffs have sent Defendants a copy of this Court's order (ECF No. 31) setting the briefing schedule for this Motion.

Dated: April 7, 2025

Respectfully submitted,

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**Admitted pro hac vice*

***Application for pro hac vice admission
forthcoming*

**** D.D.C. application pending*

*****Application for D.D.C. admission
forthcoming*

/s/ Norman L. Eisen

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forthcoming*

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*****Application for D.D.C. admission
forthcoming*

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CERTIFICATE OF SERVICE

I hereby certify that, on April 7, 2025, I served the foregoing Motion for Preliminary Injunction on the Democratic National Committee Plaintiffs by emailing it to their attorneys, listed below, who consented to service via email on April 4, 2025:

Lali Madduri, lmadduri@elias.law

Aria Branch, abranch@elias.law

I also certify that I served the foregoing Motion for Preliminary Injunction on all Defendants in this matter by sending it via certified mail to the addresses listed below, as well as by emailing it to their attorneys at the email addresses listed below:

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Washington, DC 20500

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DONALD L. PALMER, in his official capacity as Chairman and a Commissioner of the Election Assistance Commission
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