

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LEAGUE OF WOMEN VOTERS, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,

Defendants.

Case No. 1:25-cv-3501-SLS

**PLAINTIFFS' SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION TO
ENFORCE SUMMARY JUDGMENT ORDER**

Pursuant to the Court's Minute Order of July 18, 2026, Plaintiffs submit this supplemental memorandum in support of their motion to enforce the Court's summary judgment order, *see* ECF 128, to address the following inquiries:

(1) Update the Court on the status of the Plaintiffs' intervention request in *Florida v. DHS*, No. 3:24-cv-509 (N.D. Fla.)

On July 19, 2026, the *Florida* court granted Plaintiffs League of Women Voters' ("LWV") and Electronic Information Privacy Center's ("EPIC") motion to intervene. *See* Order, *Florida v. DHS*, No. 3:24-cv-509, ECF 54 (N.D. Fla. July 19, 2026) ("*Florida*"). Earlier today, Plaintiffs LWV and EPIC noticed their appeal of the *Florida* court's July 7, 2026 order granting the *Florida* plaintiffs' emergency motion to enforce their settlement agreement with the Department of Homeland Security ("DHS"). *See Florida*, ECF 55.

In Plaintiffs' view, the *Florida* court's order granting intervention and the intervenors' subsequent notice of appeal do not "moot this Court's need to address" Plaintiffs' motion seeking relief for Defendants' ongoing and undisputed violations of this Court's summary judgment order.

Contra July 18, 2026 Minute Order. So long as Defendants are operating the vacated functions of modified SAVE, Plaintiffs' motion presents a live controversy. Moreover, as previously explained, the Social Security Administration ("SSA") is not a party to the *Florida* case, and thus the *Florida* proceedings present no bar to this Court enforcing its summary judgment order against SSA. *See* ECF 128 at 9-12; ECF 130 at 8-10.

(2) Provide the Parties' best understanding of the Northern District of Florida's expected timeline for ruling on that motion

See response to item (1) above.

(3) Update the Court on whether the Federal Defendants have appealed the Northern District of Florida's ruling in light of their representations in the [129] Opposition that the Northern District of Florida lacked jurisdiction to enter its judgment.

As of the time of this filing, the Federal Defendants have not appealed the *Florida* court's July 7 enforcement order.

Dated: July 20, 2026

Respectfully submitted,

/s/ Nikhel S. Sus

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