

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

LEAGUE OF WOMEN VOTERS OF THE
UNITED STATES, *et al.*

Plaintiffs,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*

Defendants.

Case No. 8:25-cv-03777-ABA

NATIONAL COUNCIL OF JEWISH
WOMEN, GREATER NEW ORLEANS
SECTION

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES, *et al.*

Defendants.

Case No. 8:25-cv-03675-ABA

JOINT STIPULATION FOR ENTRY OF FINAL JUDGMENT

Plaintiffs and Defendants (the “Parties”), by and through their undersigned counsel, hereby stipulate as follows:

WHEREAS, on August 3, 2026, the Court entered an Order and accompanying Memorandum Opinion granting Plaintiffs preliminary relief and staying the effective date of United States Citizenship and Immigration Services (“USCIS”) Policy Alert PA-2025-21 and the corresponding revisions to the USCIS Policy Manual (collectively, the “challenged policy”) and reinstating the corresponding portions of the USCIS Policy Manual effective on June 28, 2017, pending final resolution of this action; and

WHEREAS, after considering the Parties’ evidence and arguments, the Court concluded that Plaintiffs had demonstrated a likelihood of success on their Administrative Procedure Act claims and certain constitutional claims, and entered relief pursuant to 5 U.S.C. § 705; and

WHEREAS, Defendants disagree with the Court’s ruling but acknowledge that the same findings of fact and conclusions of law that supported the Court’s August 3, 2026 Memorandum Opinion and Order would warrant final judgment on the same claims for which the Court found a likelihood of success on the merits; and

WHEREAS, on August 31, 2026, USCIS rescinded the challenged policy, and reinstated the prior policy in the USCIS Policy Manual to permit nonprofit and nonpartisan non-governmental organizations to participate in administrative naturalization ceremonies, *see* USCIS Policy Alert PA-2026-11; and

WHEREAS, the Parties desire to bring this litigation to a full and final resolution without further proceedings;

NOW, THEREFORE, the Parties stipulate and jointly request as follows:

1. The Parties agree that the preliminary-injunction record constitutes a complete record for final disposition of this action.
2. The Parties agree that the Court may enter final judgment consistent with the Court's Memorandum Opinion and Order dated August 3, 2026, without additional dispositive motion practice or further contested litigation regarding the merits of Plaintiffs' claims.
3. The Parties agree to entry of the attached Proposed Order entering final judgment in favor of Plaintiffs on Counts I, III, IV, V, and VI of Plaintiff National Council for Jewish Women's Amended Complaint (Dkt. No. 17, Case No. 8:25-cv-03675-ABA), and Counts I, II, III, and V of Plaintiffs League of Women Voters' Complaint (Dkt. No. 2, Case No. 8:25-cv-03777-ABA). The parties agree Plaintiffs' remaining claims should be dismissed without prejudice.
4. The Parties agree the Final Judgment would (1) vacate USCIS Policy Alert PA-2025-21 and its corresponding revisions to the USCIS Policy Manual pursuant to 5 U.S.C. § 706(2); and (2) reinstate the corresponding portions of the USCIS Policy Manual as they were effective on June 28, 2017.
5. The Parties agree that, for the purposes of final disposition of this action, the Court should adopt the findings and conclusions set forth in its August 3, 2026, Memorandum Opinion as final findings of fact and conclusions of law to support the Final Judgment.
6. Defendants knowingly and voluntarily waive any right to appeal from the Final Judgment entered pursuant to this Stipulation.
7. The parties agree that nothing in the Final Judgment restrains or prohibits any future decision-making by the federal government with respect to the operation of administrative naturalization ceremonies or the manner in which voter registration services are provided in connection with administrative naturalization ceremonies.

8. The parties agree that the Court's findings and conclusions set forth in its August 3, 2026 Memorandum Opinion and Order, and as adopted to support entry of final judgment, are limited to the issues presented in this action and shall not have preclusive effect in any future litigation involving Plaintiffs and Defendants relating to any new decision-making by the federal government with respect to the operation of administrative naturalization ceremonies or the manner in which voter registration services are provided in connection with administrative naturalization ceremonies. The Parties explicitly waive, relinquish, and disclaim any right to assert the doctrines of collateral estoppel, issue preclusion, res judicata, claim preclusion, or judicial estoppel in any such future action between the Parties.
9. Upon entry of the Final Judgment, all claims asserted in this action shall be resolved.

Dated: October 9, 2026

Respectfully submitted,

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/s/ Richard C. Giles
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CERTIFICATE OF SERVICE

I hereby certify that on October 09, 2026, I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system.

/s/ Bruce V. Spiva
Bruce V. Spiva

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