

**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

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs the League of Women Voters of the United States, League of Women Voters Education Fund, League of Women Voters of Colorado, League of Women Voters of New Jersey, League of Women Voters of New Jersey Education Fund, League of Women Voters of Saratoga County, League of Women Voters of the Charleston Area, and League of Women Voters of Milwaukee County (“Plaintiffs”), for the reasons set forth in the memorandum of law filed concurrently with this motion as supported by the exhibits and declarations submitted therewith, respectfully move the Court for an Order under Federal Rule of Civil Procedure 65.

Plaintiffs move for a preliminary injunction and a stay under 5 U.S.C. § 705 as to USCIS’s August 2025 rule (“Voter Registration Ban” or “Ban”). Specifically, Plaintiffs request that this Court stay or enjoin enforcement of the Ban as a violation the Administrative Procedure Act (“APA”), 5 U.S.C. § 706(2)(D), as a rulemaking that did not follow proper procedure (Count I), as arbitrary and capricious (Count II), and as contrary to constitutional rights (Counts V & VI),

and as unconstitutional because it violates the First Amendment's guarantee of free speech (Count III) and the First Amendment's guarantee of freedom of association (Count IV).

The Court should grant the motion because Plaintiffs are substantially likely to succeed on the merits, are irreparably harmed, and the balance of equities and public interest weigh in Plaintiffs' favor.

WHEREFORE, Plaintiffs request that the Court stay the effective date of the challenged action pursuant to 5 U.S.C. § 705 and grant Plaintiffs an injunction providing that Defendant United States Citizenship and Immigration Services, Defendant Joseph Edlow, Defendant United States Department of Homeland Security, and Defendant Kristi Noem must take no steps to enforce the Voter Registration Ban, with binding effect on Defendants and their officers, agents, servants, employees, and attorneys—and others in active concert or participation with any of them—who receive actual notice of the injunction by personal service or otherwise.

Dated: December 17, 2025

Respectfully submitted,

/s/ Bruce V. Spiva

Bruce V. Spiva (D. MD. Bar No. 17523)

Danielle Lang\*

Anna Baldwin\*

Alexandra Copper\*

Valencia Richardson\*

Renata O'Donnell\*

Rachel Appel\*

Daniel Brophy\*

CAMPAIGN LEGAL CENTER

1101 14th St. NW, Suite 400

Washington, D.C. 20005

(202) 736-2200

bspiva@campaignlegalcenter.org

dlang@campaignlegalcenter.org

abaldwin@campaignlegalcenter.org

acopper@campaignlegalcenter.org

vrichardson@campaignlegalcenter.org

rodonnell@campaignlegalcenter.org

rappel@campaignlegalcenter.org

dbrophy@campaignlegalcenter.org

\* Admitted *pro hac vice*