

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

DSCC, *et al.*,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 26-cv-1114 (CJN)

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

Plaintiffs,

v.

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

Defendants.

Civil Action No. 26-cv-1132 (CJN)

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE, *et al.*,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 26-cv-1151 (CJN)

DEMOCRATIC PARTY PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Plaintiffs the DSCC, DCCC, Democratic National Committee, Democratic Governors Association, and the Democratic Leaders of the U.S. Senate and House, Charles E. “Chuck” Schumer and Hakeem S. Jeffries, respectively (collectively, “Democratic Party Plaintiffs”) respectfully move for a preliminary injunction, pursuant to Fed. R. Civ. P. 65 and LCvR 65.1, and stay of administrative action, pursuant to 5 U.S.C. § 705, and state as follows:

Democratic Party Plaintiffs seek to preliminarily enjoin Defendants, their officers, agents, and employees from enforcing, complying with, or taking any further steps to implement Sections 2(a), 3(b) and (4)(a) of Executive Order 14399 (the “Order”). Democratic Party Plaintiffs further seek to stay Defendants’ actions taken pursuant to Section 2(a).

This is one of three cases brought in this District to challenge the Order. In addition to Democratic Party Plaintiffs, two other Plaintiff groups—LULAC Plaintiffs and NAACP Plaintiffs—brought suit in this District.¹ On April 9, 2026, the Court consolidated all three actions and adopted a briefing schedule for preliminary injunction motions proposed by the LULAC and NAACP Plaintiffs. *See* Case No. 26-cv-1114, ECF No. 27 (Order granting motion to consolidate and adopting briefing schedule). Under the adopted briefing schedule, each Plaintiff group must file a motion for preliminary injunction on or before April 10, 2026, “identifying the claims on which each group of Plaintiffs seeks relief.” *See* Case No. 26-cv-1132, ECF No. 14, at 3 (the briefing schedule). Each Plaintiff group must then file its memorandum of points and authorities on or before April 17. *Id.*

¹ LULAC Plaintiffs are League of United Latin American Citizens (“LULAC”), the Secure Families Initiative, and the Arizona Students’ Association. LULAC Plaintiffs brought Case No. 26-cv-1132. The NAACP Plaintiffs are the National Association for the Advancement of Colored People (“NAACP”), Common Cause, Common Cause Education Fund, Black Voters Matter Fund, Inc., and BVM Capacity Building Institute, Inc. NAACP Plaintiffs brought Case No. 26-cv-1151.

Pursuant to the Court’s order and adopted briefing schedule, Democratic Party Plaintiffs move for preliminary injunctive relief on the following claims:

- Count I: *Ultra Vires* Presidential Action
- Count II: Violation of the Separation of Powers – Unlawful Intrusion upon Congressional Authority
- Count III: Violation of the Separation of Powers – Unlawful Intrusion upon State Authority
- Count IV: Violation of the USPS’s Statutory Authority
- Count V: Unlawful Agency Action Contrary to the Privacy Act

As Democratic Party Plaintiffs will set forth in more detail in their memorandum of points and authorities and the exhibits appended thereto, the challenged provisions of the Order should be preliminarily enjoined because they are *ultra vires*, incompatible with separation of powers principles, and in violation of several federal statutes, and because Democratic Party Plaintiffs satisfy all other prerequisites for preliminary relief. *See Am. Forest Res. Council v. United States*, 77 F.4th 787, 796 (D.C. Cir. 2023); *Collins v. Yellen*, 594 U.S. 220, 245 (2021).

Pursuant to Local Rule 65.1, Democratic Party Plaintiffs aver that expedition is made essential by the irreparable and ongoing harm to Democratic Party Plaintiffs’ operations, as will be detailed in their memorandum of points and authorities.

Democratic Party Plaintiffs further state that no monetary security is required under Federal Rule of Civil Procedure 65(c) because Defendants will not suffer any harm as a result of a preliminary injunction here. *See Nat’l Council of Nonprofits v. Off. of Mgmt. & Budget*, 775 F. Supp. 3d 100, 130 (D.D.C. 2025) (“Rule 65(c) ‘has been read to vest broad discretion in the district court to determine the appropriate amount of an injunction bond,’ ‘including the discretion to require no bond at all.’” (quoting *DSE, Inc. v. United States*, 169 F.3d 21, 33 (D.C. Cir. 1999), then *P.J.E.S. ex rel. Escobar Francisco v. Wolf*, 502 F. Supp. 3d 492, 520 (D.D.C. 2020))).

“Moreover, requiring a bond as a condition of obtaining an injunction against unlawful executive action under the circumstances presented here would risk deterring other litigants from pursuing their right to judicial review of unlawful executive action.” *League of United Latin Am. Citizens v. Exec. Off. of the President*, 780 F. Supp. 3d 135, 225 (D.D.C. 2025).

Pursuant to Local Civil Rule 7(m), undersigned counsel states that counsel for Democratic Party Plaintiffs conferred with counsel for Defendants regarding this motion for preliminary injunction. The motion is opposed.

Democratic Party Plaintiffs will submit a proposed order to accompany their memorandum of points and authorities in support of their motion on April 17.

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Dated: April 10, 2026

Respectfully submitted,

/s/ Lalitha D. Madduri

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*Application for admission pending

**Admitted *pro hac vice*

Counsel for the Democratic Party Plaintiffs

CERTIFICATE OF SERVICE

I certify that I served the foregoing Motion for Preliminary Injunction on all Defendants named in this Motion by filing it via the Court's CM/ECF System.

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