

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

STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

v.

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

Defendants.

Case No. 1:26-cv-11581-IT

DEFENDANTS' MOTION TO TRANSFER

On March 31, 2026, President Donald J. Trump issued an Executive Order entitled “Ensuring Citizenship Verification and Integrity in Federal Elections.” *See* Exec. Order 14,399, 91 Fed. Reg. 17125 (Mar. 31, 2026). Plaintiffs in this action represent twenty-one states, two commonwealths, and the District of Columbia (“Plaintiffs”) who challenge various provisions of the Executive Order. Three cases that challenge the same Executive Order are already pending in the U.S. District Court for the District of Columbia. Because of their commonalities, the D.D.C. cases were consolidated (“D.D.C. Consolidated Cases.”).

Defendants respectfully move this Court to transfer this case to the United States District Court for the District of Columbia.

In support of this Motion, Defendants respectfully refer the Court to their Memorandum of Law, filed herewith.

Dated: April 16, 2026

Respectfully submitted,

BRETT A. SHUMATE
Assistant Attorney General

ERIC J. HAMILTON
Deputy Assistant Attorney General

JOSEPH E. BORSON
Assistant Branch Director

/s/ Esam K. Al-Shareffi

STEPHEN M. PEZZI

FL Bar No. 1041279

Senior Trial Counsel

ESAM K. AL-SHAREFFI

D.C. Bar No. 90010174

Trial Attorney

U.S. Department of Justice

Civil Division, Federal Programs Branch

1100 L Street, NW

Washington, DC 20530

Telephone: (202) 598-7367

E-mail: esam.k.al-shareffi@usdoj.gov

Counsel for Defendants

Local Rule 7.1 Certification

I hereby certify that I conferred with counsel for Plaintiffs prior to the filing of this motion, pursuant to Local Rule 7.1(a)(2). I was unable to resolve or narrow the issues for review. Plaintiffs are opposed to this motion.

/s/ Esam K. Al-Shareffi

ESAM K. AL-SHAREFFI