**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.

Civil Action No. 1:26-cv-03602

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**PLAINTIFFS' STATUS REPORT**

On October 29, 2026, at 5:24 pm, Judge Chutkan's chambers emailed counsel for both Plaintiffs and the government requesting that the parties "confer regarding a schedule for further proceedings" concerning Plaintiffs' motion for emergency relief "and promptly file a status report with the Court." Per the Court's request, Plaintiffs' counsel have proposed a schedule by both phone and email. But as of 12:00 am, Defendants have yet to respond to Plaintiffs' proposed schedule. Given Plaintiffs' urgent need for relief, Plaintiffs request that the Court adopt the schedule described in this status report.

As explained in Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for a Temporary Restraining Order, Stay Under 5 U.S.C. § 705, and/or Preliminary Injunction, Plaintiffs League of United Latin American Citizens ("LULAC") and Electronic Privacy Information Center ("EPIC") are suffering immediate and ongoing injuries due to Defendants' unlawful Voter Data Transmission Policy—in the form of organizational activity harms, voter confusion harms, and informational harms. Those injuries will only become more acute as Election Day nears.

Because of the risk of irreparable harm, on October 29, 2026, at 10:31 am, Plaintiffs' counsel advised Defendants' counsel by email of their intent to file a motion for preliminary relief later in the day. Later that afternoon, Plaintiffs contacted the clerk's office to provide notice of their intention to file a motion for a temporary restraining order after business hours. At 5:24 pm, Judge Chutkan's chambers emailed both Plaintiffs' counsel and the U.S. Attorney's Office for the District of Columbia requesting that the parties confer and file a status report. Shortly afterwards, the attorney from the U.S. Attorney's Office copied the handling attorney for the government.

Subsequently, Plaintiffs' counsel repeatedly reached out to Defendants' counsel to discuss scheduling. Counsel spoke by phone at both 5:43 pm and 6:17 pm. During the second call, Plaintiffs' counsel proposed a schedule to Defendants. At 6:38 pm, per Defendants' counsel's request, Plaintiffs' counsel proposed that same schedule by email. Plaintiffs' counsel again reached out by email at 11:40 pm. Defendants' counsel have yet to respond and have neither addressed Plaintiffs' proposal nor offered their own.

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As Plaintiffs' counsel made clear in their correspondence with Defendants' counsel, Plaintiffs would be willing to agree to concessions on the schedule if Defendants would agree that, until the Court adjudicates the pending motion, they would not send lists of voters to states and localities or letters demanding that the recipients take certain actions with respect to the voters identified on those lists. Specifically, Plaintiffs would be willing to agree to a schedule in which Defendants would file an opposition brief by Saturday, October 31, at 11:59 pm and the parties would request a hearing for 9:00 am on Monday, November 2—the day before Election Day. However, Defendants have not indicated whether they would make such a commitment.

Considering Plaintiffs' ongoing and irreparable injuries and the absence of any commitment by Defendants that they will not exacerbate those injuries by sending additional lists

of voters to jurisdictions with additional demands, Plaintiffs have a pressing need for immediate adjudication of this motion. Accordingly, Plaintiffs request the following:

- The Court order Defendants to file any opposition to Plaintiffs' motion by 3:00 pm on Friday, October 30; and
- The Court hold a hearing following the submission of Defendants' opposition at the Court's earliest convenience.

Dated October 30, 2026

Respectfully submitted,

*/s/ Louis R. Katz*

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