

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

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

Plaintiffs,

v.

EXECUTIVE OFFICE OF THE PRESIDENT,
et al.,

Defendants.

Civil Action No. 25-0946 (CKK)

DEMOCRATIC NATIONAL COMMITTEE,
et al.,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 25-0952 (CKK)

LEAGUE OF WOMEN VOTERS
EDUCATION FUND, *et al.*,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 25-0955 (CKK)

**LEAGUE¹ AND LULAC² PLAINTIFFS’
MOTION FOR PRELIMINARY INJUNCTION**

¹ Plaintiffs League of Women Voters Education Fund, League of Women Voters of the United States, League of Women Voters of Arizona, Hispanic Federation, National Association for the Advancement of Colored People, OCA-Asian Pacific American Advocates, and Asian and Pacific Islander American Vote.

² Plaintiffs League of United Latin American Citizens, Secure Families Initiative, and Arizona Students’ Association.

Pursuant to Federal Rule of Civil Procedure 65 and Local Civil Rule 65.1, Plaintiffs League of Women Voters Education Fund, League of Women Voters of the United States, League of Women Voters of Arizona, Hispanic Federation, National Association for the Advancement of Colored People, OCA-Asian Pacific American Advocates, and Asian and Pacific Islander American Vote (“League Plaintiffs”) and Plaintiffs League of United Latin American Citizens, Secure Families Initiative, and Arizona Students’ Association (“LULAC Plaintiffs”) respectfully move for a preliminary injunction against Defendants United States Election Assistance Commission (“EAC”), Donald L. Palmer (in his official capacity as Chairman and a Commissioner of the EAC), Thomas Hicks (in his official capacity as Vice Chair and a Commissioner of the EAC), Christy McCormick and Benjamin W. Hovland (in their official capacities as Commissioners of the EAC), and Brianna Schletz (in her official capacity as Executive Director of the EAC) (“Defendants”). League and LULAC Plaintiffs respectfully move to preliminarily enjoin Defendants EAC, Palmer, Hicks, McCormick, Hovland, and Schletz from implementing Section 2(a) of President Trump’s March 25, 2025 Executive Order No. 14248.

As set forth in the accompanying Memorandum in Support of Motion for Preliminary Injunction, League and LULAC Plaintiffs are entitled to a preliminary injunction because they are likely to succeed on the merits of their claims, they are suffering and will continue to suffer irreparable injury in the absence of the requested relief, the balance of equities tips in their favor, and the issuance of the injunction is in the public interest.

The grounds for this Motion are fully set forth in the accompanying Memorandum in Support, and a Proposed Order is attached.

STATEMENT PURSUANT TO LOCAL CIVIL RULE 7(m)

Local Rule 7(m) provides that, “[b]efore filing any nondispositive motion in a civil action, counsel shall discuss the anticipated motion with opposing counsel in a good-faith effort to determine whether there is any opposition to the relief sought and, if there is, to narrow the areas of disagreement.” League and LULAC Plaintiffs have conferred with Defendants about this

Motion. Defendants oppose the Motion. League and LULAC Plaintiffs have sent Defendants a copy of this Court's order (ECF No. 31) setting the briefing schedule for this Motion.

Dated: April 7, 2025

Respectfully submitted,

Wendy R. Weiser*
Sean Morales-Doyle*
Eliza Sweren-Becker*
Jasleen K. Singh*
BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW
120 Broadway, Suite 1750
New York, NY 10271
(646) 292-8310
weiserw@brennan.law.nyu.edu
morales-doyles@brennan.law.nyu.edu
sweren-beckere@brennan.law.nyu.edu
singhj@brennan.law.nyu.edu

Leah C. Aden**
John S. Cusick**
Brenda Wright**
NAACP LEGAL DEFENSE &
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
(212) 965-2200
laden@naacpldf.org
jcusick@naacpldf.org
bwright@naacpldf.org

Miranda Galindo**
Cesar Z. Ruiz**
Delmarie Alicea**
LATINO JUSTICE PRLDEF
475 Riverside Drive, Suite 1901
New York, NY 10115
(212) 392-4752
mgalindo@latinojustice.org
cruiz@latinojustice.org
dalicea@latinojustice.org

/s/ Megan C. Keenan
Megan C. Keenan (D.C. Bar No. 1672508)
Sarah Brannon**** (D.C. Bar No. 90024493)
Adriel I. Cepeda Derieux** (D.C. Bar No.
90026636)
Jacob Van Leer (DC Bar No. 1742196)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
915 15th St. NW
Washington, DC 20001
(740) 632-0671
mkeenan@aclu.org
sbrannon@aclu.org
acepedaderieux@aclu.org
jvanleer@aclu.org

Sophia Lin Lakin*
Ethan Herenstein*
Jonathan Topaz*
Clayton Pierce*
Davin Rosborough*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad St., 18th Floor
New York, NY 10004
(212) 549-2500
slakin@aclu.org
ehenstein@aclu.org
jtopaz@aclu.org
cpierce@aclu.org
drosborough@aclu.org

Michael Perloff (D.C. Bar No. 1601047)
Scott Michelman (D.C. Bar No. 1006945)
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
OF THE DISTRICT OF COLUMBIA
529 14th Street NW, Suite 722
Washington, D.C. 20045
(202) 457-0800
mperloff@acludc.org

smichelman@acludc.org

Niyati Shah (D.C. Bar No. 1659560)
Alizeh Ahmad (D.C. Bar No. 90018919)
ASIAN AMERICANS
ADVANCING JUSTICE-AAJC
1620 L Street, NW, Suite 1050
Washington, D.C. 20036
(202) 296-2300
nshah@advancingjustice-aajc.org
aahmad@advancingjustice-aajc.org

*Counsel for Plaintiffs League of Women Voters
Education Fund, League of Women Voters of
the United States, League of Women Voters of
Arizona, Hispanic Federation, National
Association for the Advancement of Colored
People, OCA-Asian Pacific American
Advocates, and Asian and Pacific Islander
American Vote*

**Admitted pro hac vice
**Application for pro hac vice admission
forthcoming
*** D.D.C. application pending
****Application for D.D.C. admission
forthcoming*

/s/ Norman L. Eisen

Norman L. Eisen (D.C. Bar No. 435051)
Tianna J. Mays (D.C. Bar No. 90005882)**
Pooja Chaudhuri (D.C. Bar No. 888314523)
STATE DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE #15180
Washington, D.C. 20003
(202) 601-8678
norman@statedemocracydefenders.org
tianna@statedemocracydefenders.org
pooja@statedemocracydefenders.org

*Counsel for Plaintiffs League of United Latin
American Citizens, Secure Families Initiative,
and Arizona Students Association*

***Application for pro hac vice admission
forthcoming
*** D.D.C. application pending
****Application for D.D.C. admission
forthcoming*

/s/ Danielle Lang

Danielle Lang (DC Bar No. 1500218)
Jonathan Diaz (DC Bar No. 1613558)
Robert Brent Ferguson (DC Bar No. 1782289)***
Anna Baldwin (DC Bar No. 998713)***
Heather Szilagyi (DC Bar No. 90006787)
Benjamin Phillips (DC Bar No. 90005450)****
CAMPAIGN LEGAL CENTER
1101 14th St. NW, Suite 400
Washington, D.C. 20005
(202) 736-2200
dlang@campaignlegalcenter.org
jdiaz@campaignlegalcenter.org
bferguson@campaignlegalcenter.org
abaldwin@campaignlegalcenter.org
hszilagyi@campaignlegalcenter.org
bphillips@campaignlegalcenter.org

CERTIFICATE OF SERVICE

I hereby certify that, on April 7, 2025, I served the foregoing Motion for Preliminary Injunction on the Democratic National Committee Plaintiffs by emailing it to their attorneys, listed below, who consented to service via email on April 4, 2025:

Lali Madduri, lmadduri@elias.law

Aria Branch, abranch@elias.law

I also certify that I served the foregoing Motion for Preliminary Injunction on all Defendants in this matter by sending it via certified mail to the addresses listed below, as well as by emailing it to their attorneys at the email addresses listed below:

DONALD J. TRUMP, in his official capacity as President of the United States
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

UNITED STATES ELECTION ASSISTANCE COMMISSION
633 3rd Street, NW, Suite 200
Washington, DC 20001

DONALD L. PALMER, in his official capacity as Chairman and a Commissioner of the Election Assistance Commission
633 3rd Street, NW, Suite 200
Washington, DC 20001

THOMAS HICKS, in his official capacity as Vice Chair and a Commissioner of the Election Assistance Commission
633 3rd Street, NW, Suite 200
Washington, DC 20001

CHRISTY MCCORMICK, in her official capacity as a Commissioner of the Election Assistance Commission
633 3rd Street, NW, Suite 200
Washington, DC 20001

BENJAMIN W. HOVLAND, in his official capacity as a Commissioner of the Election Assistance Commission
633 3rd Street, NW, Suite 200
Washington, DC 20001

BRIANNA SCHLETZ, in her official capacity as Executive Director of the Election Assistance Commission
633 3rd Street, NW, Suite 200
Washington, DC 20001

PAMELA J. BONDI, Attorney General of the United States
950 Pennsylvania Avenue, NW
Washington, DC 20530

EDWARD R. MARTIN, JR., Interim U.S. Attorney for the District of Columbia
Civil Process Clerk
U.S. Attorney's Office for D.C.
601 D Street, NW
Washington, DC 20530

Michael Gates, Michael.Gates2@usdoj.gov

Andrew Darlington, Andrew.Darlington@usdoj.gov

/s/ Megan C. Keenan
Megan C. Keenan (DC Bar No. 1672508)
AMERICAN CIVIL LIBERTIES UNION FOUNDATION
915 15th St. NW
Washington, DC 20001
(740) 632-0671
mkeenan@aclu.org