

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

CITIZENS FOR RESPONSIBILITY  
AND ETHICS IN WASHINGTON,

Plaintiff,

v.

OFFICE OF MANAGEMENT AND  
BUDGET, et al.

Defendants.

Civil Action No. 25-cv-1051

**PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION  
AND PARTIAL SUMMARY JUDGMENT**

Pursuant to Federal Rules of Civil Procedure 56 and 65, plaintiff Citizens for Responsibility and Ethics in Washington (CREW) hereby moves for a preliminary injunction and partial summary judgment on its Administrative Procedure Act claims that Defendants' removal of the Public Apportionments Database and public access to apportionment information is contrary to law. In support of this motion, CREW submits the accompanying memorandum of law, the Statement of Material Facts, the Declaration of Christina L. Wentworth, the Declaration of Samuel Bagenstos, the Declaration of Joseph Carlile, the Declaration of Kenneth Schwartz, and a proposed order.

Pursuant to Local Civil Rule 65.1(d), CREW respectfully requests that the Court set a hearing at the earliest available date not later than May 1, 2025. As explained in the accompanying memorandum, expedition is essential to prevent irreparable harm to Plaintiff caused by Defendants' ongoing unlawful conduct.

Dated: April 18, 2025

Respectfully submitted,

/s/ Wendy Liu

---

Wendy Liu (DC Bar No. 1600942)  
Adina H. Rosenbaum (DC Bar No. 490928)  
Allison M. Zieve (DC Bar No. 424786)  
Public Citizen Litigation Group  
1600 20th Street NW  
Washington, DC 20009  
(202) 588-1000

Nikhel S. Sus (DC Bar No. 1017937)  
Yoseph T. Desta (DC Bar No. 90002042)\*  
Citizens for Responsibility and Ethics in  
Washington  
1331 F St. NW, Suite 900  
Washington, DC 20004  
(202) 408-5565

\*admitted *pro hac vice*

*Counsel for Plaintiff*