

**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.

Case No. 25-cv-3501-SLS

HEARING REQUESTED

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs League of Women Voters (“LWV”), League of Women Voters of Texas (“LWVTX”), League of Women Voters of Louisiana and League of Women Voters of Louisiana Education Fund (together, “LWVLA”), League of Women Voters of Virginia (“LWVVA”), and Electronic Privacy Information Center (“EPIC”) respectfully move for summary judgment under Federal Rule of Civil Procedure 56 and Local Civil Rule 7(h).¹ LWV, LWVTX, LWVLA, and LWVVA move for summary judgment on Counts One through Six of the First Amended and Supplemental Complaint, ECF 61. EPIC moves for summary judgment on all counts.

As set forth in the accompanying memorandum, Defendants have illegally overhauled the Department of Homeland Security’s Systematic Alien Verification for Entitlements (“SAVE”) system in violation of the Administrative Procedure Act and the constitutional separation of powers. The Court should hold unlawful, vacate, and set aside Defendants’ overhaul of SAVE, and grant appropriate declaratory and injunctive relief. The Court should also compel Defendants to publish all statutorily required matching-agreement information concerning the overhauled SAVE system in the Federal Register no later than 14 days after its ruling on this motion.

In support of this motion, Plaintiffs submit the attached memorandum of law, index of

¹ Per the Court’s February 4, 2026, Minute Order, the parties need not submit statements of fact under D.D.C. Local Rule 7(h).

declarations,² Declaration of Anthony Nel, Declaration of Alex Doe, Declaration of Bailey Doe, Declaration of Cory Doe, Declaration of Joyce LeBombard, Supplemental Declaration of M. Christian Green, Supplemental Declaration of Celina Stewart, Declaration of Alan Butler, Declaration of Lorraine Kisselburgh, and a proposed order.³

Plaintiffs request an oral hearing on this motion pursuant to Local Civil Rule 7(f).

Dated: March 12, 2026

Respectfully submitted,

/s/ Nikhel S. Sus

Nikhel S. Sus (D.C. Bar No. 1017937)
John B. Hill (N.Y. Bar No. 5505508)*
Lauren C. Bingham (Fl. Bar No. 105745)*
CITIZENS FOR RESPONSIBILITY
AND ETHICS IN WASHINGTON
P.O. Box 14596
Washington, DC 20044

Jon Sherman (D.C. Bar No. 998271)*
Michelle Kanter Cohen (D.C. Bar No.
989164)
Emily Davis (D.C. Bar No. 90020129)
FAIR ELECTIONS CENTER

[Redacted]

[Redacted]

Counsel for All Plaintiffs

Counsel for All Plaintiffs

Aman T. George (D.C. Bar No. 1028446)
Jennifer Fountain Connolly (D.C. Bar No.
1019148)
Johanna M. Hickman (D.C. Bar No. 981770)
Mark B. Samburg (D.C. Bar No. 1018533)
Robin Thurston (D.C. Bar No. 1531399)
DEMOCRACY FORWARD FOUNDATION
P.O. Box 34553
Washington, DC 20043

John L. Davisson (D.C. Bar No. 1531914)
Enid Zhou (D.C. Bar No. 1632392)
Abigail Kunkler (D.C. Bar No. 90030868)
Mayu Tobin-Miyaji (D.C. Bar No. 90033340)
ELECTRONIC PRIVACY INFORMATION CENTER

[Redacted]

[Redacted]

*Counsel for Plaintiff Electronic Privacy
Information Center*

* admitted pro hac vice

Counsel for All Plaintiffs

² The index lists all declarations supporting this motion, including declarations previously filed in this case. It identifies each declarant’s plaintiff affiliation and the reason the declaration is offered.

³ After the close of briefing, the parties will file an appendix containing copies of the portions of the administrative record cited or otherwise relied upon. *See* Local Civ. R. 7(n).