

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

COMMON CAUSE, *et al.*

Plaintiffs,

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*

Defendants.

Case No. 1:26-cv-01352-SLS

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule 7(h), Plaintiffs Anthony Nel, Haley Smith, Linda Duckworth, Ruth Nasrullah, Common Cause, and Common Cause Education Fund respectfully move for summary judgment on Counts I, VI, VII, and VIII of Plaintiffs' Complaint (ECF No. 1). For the reasons set forth in the accompanying Memorandum of Law, Plaintiffs are entitled to summary judgment on Counts I, VI, VII, and VIII of their Complaint. In support of this Motion, Plaintiffs submit the attached Declarations of John B. Hill (Exhibit A), Elena Nunez (Exhibit B), Gavin Geis (Exhibit C), Julia Vaughn (Exhibit D), Catherine Turcer (Exhibit E), Anthony Gutierrez (Exhibit F), Plaintiff Anthony Nel (Exhibit G), Plaintiff Linda Duckworth (Exhibit H), Plaintiff Ruth Nasrullah (Exhibit I), Plaintiff Haley Smith (Exhibit J), Alex Doe (Exhibit K), Bailey Doe (Exhibit L), Claudio Mosse (Exhibit M), and Mohammed Nasrullah (Exhibit N). A proposed order is also attached.

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

Dated: May 19, 2026

Respectfully submitted,

By: /s/ Nikhel S. Sus

Nikhel S. Sus (D.C. Bar No. 1017937)

John B. Hill (N.Y. Bar No. 5505508)*

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* Admitted *pro hac vice*

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