

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

ELECTRONIC PRIVACY INFORMATION
CENTER,

Plaintiff,

v.

U.S. CITIZENSHIP AND IMMIGRATION
SERVICES, *et al.*,

Defendants.

Case No. 8:26-cv-03457-PX

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56 and Local Rule 105, and for the reasons explained in the accompanying memorandum of law, Plaintiff Electronic Privacy Information Center (EPIC) moves for summary judgment against Defendants United States Citizenship and Immigration Services (USCIS) and Department of Homeland Security (DHS) (collectively, the DHS Defendants) as to **Counts I, II, III, and IV** of Plaintiff's Complaint (ECF No. 1). For the reasons set forth in the accompanying Memorandum of Law, Plaintiff is entitled to summary judgment on Counts I, II, III, and IV. Because those Counts present pure questions of law for which there is no dispute of fact, these legal claims are suitable for resolution at this stage of litigation.

In support of this Motion, Plaintiff submits the attached Declarations of John B. Hill, Alan Butler, Lorraine Kisselburgh, and Anthony Nel. A Proposed Order is also attached.

Dated: September 3, 2026

Respectfully submitted,

R. Orion Danjuma*
Julia L. Torti*
PROTECT DEMOCRACY PROJECT

[REDACTED]

Sara Chimene-Weiss*
PROTECT DEMOCRACY PROJECT

[REDACTED]

Jane Bentrutt*
Shelby Teeter*
PROTECT DEMOCRACY PROJECT

[REDACTED]

/s/ Nikhel S. Sus
Nikhel S. Sus (Bar No. 31090)
John B. Hill**
Reuven Dashevsky**
CITIZENS FOR RESPONSIBILITY
AND ETHICS IN WASHINGTON

[REDACTED]

John Davisson*
Mayu Tobin-Miyaji*
ELECTRONIC PRIVACY INFORMATION CENTER

[REDACTED]

Counsel for Plaintiff

* *Pro hac vice* motion forthcoming

** *Pro hac vice* motion filed