

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

CITIZENS FOR RESPONSIBILITY
AND ETHICS IN WASHINGTON,

Plaintiff,

v.

U.S. DEPARTMENT OF HOMELAND
SECURITY, et al.,

Defendants.

Case No. 1:26-cv-03393

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff Citizens for Responsibility and Ethics in Washington respectfully moves for a preliminary injunction in this Freedom of Information Act (“FOIA”) suit against the U.S. Department of Homeland Security (“DHS”) and its component, U.S. Citizenship and Immigration Services (“USCIS”). Because of the impending midterm elections and other time-sensitive considerations, the requested injunction would require DHS and USCIS to expedite processing of CREW’s FOIA requests, processing no fewer than 1,000 pages of potentially responsive records per week, and to produce any non-exempt responsive records—accompanied by a *Vaughn* index, if appropriate—on a rolling basis every week until all non-exempt responsive records have been released. In addition, Plaintiff requests that the Court order the parties to submit joint status reports every 14 days.

Pursuant to Local Civil Rule 65.1(c), Plaintiff respectfully requests that the Court order Defendants to file their opposition to this motion by no later than October 6, 2026, one week from today. As explained in the accompanying memorandum, expedition is essential to prevent imminent irreparable harm to Plaintiff. For that reason, Plaintiff waives its right to reply to

Defendants' opposition and to request a hearing, and respectfully asks that the Court decide its motion on the papers. Should this Court wish to hear argument, Plaintiffs respectfully requests that it schedule a hearing on a date convenient to the Court no later than October 16, 2026.

Date: September 29, 2026

Respectfully submitted,

/s/Lauren C. Bingham

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**pro hac vice motion forthcoming*