

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LEAGUE OF WOMEN VOTERS, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

Case No. 1:25-cv-03501

**UNOPPOSED MOTION BY SENATORS PADILLA & PETERS FOR LEAVE
TO FILE AMICUS BRIEF IN SUPPORT OF PLAINTIFFS**

Amici curiae (“*Amici*”) are two sitting United States Senators who, because of their duty to their constituents, their commitment to the rule of law, and their constitutional mandates, have an acute interest and unique knowledge of the issues raised in this litigation.

District Courts have “broad discretion” in deciding whether to grant leave to participate as *amici*. *Nat’l Ass’n of Home Builders v. U.S. Army Corps of Eng’rs*, 519 F. Supp. 2d 89, 93 (D.D.C. 2007). Participation by *amici* is generally allowed when “the information offered is ‘timely and useful.’” *Ellsworth Assocs., Inc. v. United States*, 917 F. Supp. 841, 846 (D.D.C. 1996). Courts customarily allow third parties to participate as *amici curiae* if they have “relevant expertise and a stated concern for the issues at stake in [the] case[.]” *District of Columbia v. Potomac Elec. Power Co.*, 826 F. Supp. 2d 227, 237 (D.D.C. 2011).

Senator Alex Padilla of California serves as the Ranking Member of the Senate Committee on Rules and Administration, which has oversight of federal elections. Before serving in the Senate, Senator Padilla was the Secretary of State for California and oversaw the maintenance of the state’s voter rolls. Based on his position and this experience, Senator Padilla is deeply

committed to ensuring eligible voters are able to cast their ballots, and that the laws that structure our electoral system are upheld.

Senator Gary Peters of Michigan serves as the Ranking Member of the Senate Committee on Homeland Security and Governmental Affairs. Previously, Senator Peters was the chairman of the Committee. The Senate Committee on Homeland Security and Governmental Affairs has jurisdiction over the Department of Homeland Security (DHS) and government information more broadly, and is tasked with receiving and reviewing notices from DHS and other agencies, including the Social Security Administration (SSA), about data system changes. Senator Peters has overseen implementation of relevant laws by agencies across the government, and has a particularized interest in ensuring that the provisions of the Privacy Act of 1974 are upheld.

Amici are deeply familiar with the Privacy Act's requirements of advance notice to Congress of any proposed data systems change. They also have unique knowledge that such notice has not been provided prior to the overhaul of the Systematic Alien Verification for Entitlements (SAVE) program. They are also particularly concerned of the potential that their constituents may suffer voting rights and privacy rights violations as a result of these violations of law, alongside millions of other Americans.

For those reasons, *amici* respectfully request that the Court grant them leave to file the proposed amicus brief attached hereto as Exhibit 1, as set forth in the accompanying proposed order.

October 10, 2025

Respectfully submitted,

/s/ Rebecca LeGrand

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**Pro Hac Vice Motions Forthcoming*

COUNSEL FOR AMICI CURIAE