

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.

No. 1:25-cv-03501-SLS

EXHIBIT 1

Letter from S. Pezzi to N. Sus (Oct. 17, 2025)



U.S. Department of Justice
Civil Division, Federal Programs Branch
1100 L Street NW
Washington, DC 20005

October 17, 2025

VIA EMAIL

Nikhel S. Sus
Citizens for Responsibility and Ethics in Washington
P.O. Box 14596
Washington, DC 20044
nsus@citizensforethics.org

Re: *League of Women Voters v. DHS*, 1:25-cv-03501-SLS (D.D.C.)

Dear Mr. Sus:

As you know, on the evening of October 14, 2025, the Court ordered Defendants to respond to Plaintiffs' motion for certification of a preliminary-relief subclass in the above-captioned matter, ECF No. 17. Before that order, the deadline for Defendants' response had been stayed pursuant to Standing Order 20 No. 25-55 (JEB), so Defendants had not been working on any response to that motion, due to the legal requirements of the Anti-Deficiency Act.

Now, in preparing their response to Plaintiffs' motion, it has become clear that Defendants cannot evaluate all possible arguments that may be available under Rule 23 without knowing the identity of the named Plaintiffs who intend to serve as class representatives. Chief Judge Boasberg recognized this possibility in his recent order granting Plaintiffs' motion to proceed via pseudonym: "Should Defendants need to learn facts about Plaintiffs or their identities as the litigation progresses—*e.g.*, to assure satisfaction of Rule 23's class certification requirements—they 'will remain free to request any further information [they] deem necessary to the full and fair defense of the case.'" *League of Women Voters v. DHS*, No. 25-cv-3501 (JEB), 2025 WL 2897654, at *3 (D.D.C. Oct. 10, 2025) (quoting *Does 1-2 v. OPM*, 763 F. Supp. 3d 58, 62 (D.D.C. 2025)).

Consistent with the procedure contemplated by Chief Judge Boasberg, Defendants now request that Plaintiffs disclose to the government the identity of Plaintiffs J. Doe 1, J. Doe 4, and J. Doe 5. Defendants agree to maintain their names under seal pending further order of the Court. Defendants request that information by 12:00 p.m. on Monday, October 20, to ensure that Defendants have adequate time to consider Plaintiffs' identities in drafting an opposition to Plaintiffs' motion.

Respectfully submitted,

/s/ Stephen M. Pezzi
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