

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LEAGUE OF WOMEN VOTERS OF THE
UNITED STATES, *et al.*,

Plaintiffs,

v.

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

Defendants.

Case No. 25-cv-3501

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR A STAY
UNDER 5 U.S.C. § 705 AND A PRELIMINARY INJUNCTION**

Upon consideration of Plaintiffs' Motion for a Stay under 5 U.S.C. § 705 and a Preliminary Injunction, Defendants' Opposition, Plaintiffs' Reply, and the entire record herein, it is hereby:

ORDERED that the Motion is **GRANTED**; it is further

ORDERED that the overhauled Systematic Alien Verification for Entitlements ("SAVE") system is **STAYED** pursuant to 5 U.S.C. § 705, or, in the alternative, preliminarily enjoined, pending resolution of this suit; it is further

ORDERED that, during the pendency of this suit, Defendants and all others within the scope of Federal Rule of Civil Procedure 65(d)(2) are:

- (1) Required to return the SAVE system to its prior operational state before Defendants unlawfully and significantly changed it;
- (2) Prohibited from operating the SAVE system beyond the scope and functionality authorized by the Privacy Act and its operative SORN prior to the system's overhaul;

(3) Prohibited from pooling, incorporating, or making available Social Security Administration records or data into or through the SAVE system without statutory authorization;

(4) Prohibited from using information unlawfully pooled, incorporated, or made available into or through the SAVE system; and

(5) Required to delete, disentangle, and unlink Social Security Administration data unlawfully pooled, incorporated, or made available into or through the SAVE system; and it is further

ORDERED Defendants shall publish systems of records notices in the Federal Register disclosing what data was pooled, incorporated, or made available into or through the overhauled SAVE system, for what purpose, and all other details for which the Privacy Act mandates disclosure no later than five business days after entry of this Order.

SO ORDERED.

Date: _____

United States District Judge