

**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.

Case No. 25-cv-3501-SLS

**HEARING REQUESTED**

**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

Plaintiffs League of Women Voters (“LWV”), League of Women Voters of Texas (“LWVTX”), League of Women Voters of Louisiana and League of Women Voters of Louisiana Education Fund (together, “LWVLA”), League of Women Voters of Virginia (“LWVVA”), and Electronic Privacy Information Center (“EPIC”) respectfully move for summary judgment under Federal Rule of Civil Procedure 56 and Local Civil Rule 7(h).<sup>1</sup> LWV, LWVTX, LWVLA, and LWVVA move for summary judgment on Counts One through Six of the First Amended and Supplemental Complaint, ECF 61. EPIC moves for summary judgment on all counts.

As set forth in the accompanying memorandum, Defendants have illegally overhauled the Department of Homeland Security’s Systematic Alien Verification for Entitlements (“SAVE”) system in violation of the Administrative Procedure Act and the constitutional separation of powers. The Court should hold unlawful, vacate, and set aside Defendants’ overhaul of SAVE, and grant appropriate declaratory and injunctive relief. The Court should also compel Defendants to publish all statutorily required matching-agreement information concerning the overhauled SAVE system in the Federal Register no later than 14 days after its ruling on this motion.

In support of this motion, Plaintiffs submit the attached memorandum of law, index of

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<sup>1</sup> Per the Court’s February 4, 2026, Minute Order, the parties need not submit statements of fact under D.D.C. Local Rule 7(h).

declarations,<sup>2</sup> Declaration of Anthony Nel, Declaration of Alex Doe, Declaration of Bailey Doe, Declaration of Cory Doe, Declaration of Joyce LeBombard, Supplemental Declaration of M. Christian Green, Supplemental Declaration of Celina Stewart, Declaration of Alan Butler, Declaration of Lorraine Kisselburgh, and a proposed order.<sup>3</sup>

Plaintiffs request an oral hearing on this motion pursuant to Local Civil Rule 7(f).

Dated: March 12, 2026

Respectfully submitted,

/s/ Nikhel S. Sus

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<sup>2</sup> The index lists all declarations supporting this motion, including declarations previously filed in this case. It identifies each declarant's plaintiff affiliation and the reason the declaration is offered.

<sup>3</sup> After the close of briefing, the parties will file an appendix containing copies of the portions of the administrative record cited or otherwise relied upon. *See* Local Civ. R. 7(n).