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. 1:25-cv-3501-SLS

[PROPOSED] ORDER GRANTING MOTION TO ENFORCE SUMMARY JUDGMENT ORDER

Upon consideration of Plaintiffs' Motion to Enforce Summary Judgment Order ("Motion"), any opposition and reply, and the record herein, the Court hereby finds that Defendants have violated the Court's June 22, 2026, summary judgment decision and order (ECF 111, 112) by reinstating access to the modified SAVE system for four user states, as Defendants disclosed in court filings (ECF 125, 126, 127). It therefore is **ORDERED** as follows:

1. Plaintiffs' Motion is **GRANTED**.

2. The Court's summary judgment order (ECF 111, 112) remains in full force and effect.

3. Defendants shall ensure that they immediately come into full compliance with that order.

[*In the alternative,* 3. The Social Security Administration ("SSA") Defendants shall ensure that they immediately come into full compliance with that order, including, but not limited to, by terminating any mechanism by which the modified SAVE system conducts searches of SSA databases or systems. Such terminated mechanisms shall include, but are not

limited to, any Application Programming Interface that provides a connection between any SSA database or system and the SAVE modified system (as that term is defined in ECF 111 at 74–75).]

4. Defendants shall, within 3 business days of the issuance of this Order, file a status report with the Court describing the steps they have taken to bring themselves into compliance with the Order, including declarations signed under penalty of perjury by representatives from both DHS and SSA attesting to the relevant facts.

5. Defendants shall notify the Court at least 72 hours in advance of taking any step (1) to restore the modified SAVE system or any materially similar replacement of that system, (2) to conduct actions inconsistent with this Court's summary judgment order, or (3) to disclose records pursuant to the new routine uses in the modified DHS and SSA Systems of Record Notices vacated by this Court's summary judgment order.

SO ORDERED.

Date: _____

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Sparkle L. Sooknanan
United States District Judge