

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

J. DOE 1-26,

*Plaintiffs*

v.

ELON MUSK, in his official capacity,  
UNITED STATES DOGE SERVICE, *and*  
the DEPARTMENT OF GOVERNMENT  
EFFICIENCY,

*Defendants.*

**Case No. 25 8:25-cv-00462-TDC**

**PLAINTIFFS' MOTION TO PROCEED UNDER PSEUDONYMS**

J. Doe Plaintiffs, who are current and former USAID employees and contractors, respectfully move to proceed under pseudonyms because the release of their names would expose them to a significant risk of harm, and because proceeding anonymously will not significantly burden the Defendants or other parties.

WHEREFORE, Plaintiffs request that the Court receive the attached Complaint and allow Plaintiffs to proceed under pseudonyms, as set forth in the attached proposed Order.

Dated: February 12, 2025

Respectfully submitted,

/s/ Norman L. Eisen

Norman L. Eisen, [9112170186]

Tianna J. Mays, [1112140221]

**STATE DEMOCRACY DEFENDERS FUND**

600 Pennsylvania Avenue SE, Suite 15180

Washington, DC 20003

Tel: (202) 594-9958

[Norman@statedemocracydefenders.org](mailto:Norman@statedemocracydefenders.org)

[Tianna@statedemocracydefenders.org](mailto:Tianna@statedemocracydefenders.org)

Mimi Marziani\*\*

Rebecca (Beth) Stevens\*\*

Joaquin Gonzalez\*\*

**MARZIANI, STEVENS & GONZALEZ PLLC**

1533 Austin Highway, Suite 102-402

San Antonio, TX 78218

Tel: (210) 343-5604

[mmarziani@msgpllc.com](mailto:mmarziani@msgpllc.com)

[bstevens@msgpllc.com](mailto:bstevens@msgpllc.com)

[jgonzalez@msgpllc.com](mailto:jgonzalez@msgpllc.com)

*Attorneys for Plaintiffs*

\*\*Application for admission or admission pro hac vice forthcoming.