## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

WILMER CUTLER PICKERING HALE AND DORR LLP.

*Plaintiff*,

v.

EXECUTIVE OFFICE OF THE PRESIDENT, et al.,

Defendants.

Case No. 1:25-cv-917

Judge Richard J. Leon

ORAL HEARING REQUESTED AND SET FOR APRIL 23, 2025

## PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56 and Local Civil Rule 7, Plaintiff Wilmer Cutler Pickering Hale and Dorr LLP ("WilmerHale" or the "Firm") moves for summary judgment on all counts of its complaint, Dkt.1.

WilmerHale respectfully requests a declaratory judgment that Executive Order 14250, entitled *Addressing Risks From WilmerHale* and issued by the President on March 27, 2025 ("Order"), is facially unconstitutional, and a permanent injunction stating that:

- (1) Defendants are enjoined from implementing or giving effect to the Order in any way, including by relying on any of the statements in Section 1;
- (2) Defendants are directed to immediately issue guidance to their officers, staff, employees, and contractors, instructing them to disregard the Order and carry on with their ordinary course of business as if the Order had never issued;
- (3) Defendant United States Department of Justice is directed to immediately issue guidance to all other agencies subject to the Order, instructing them to disregard

the Order and carry on with their ordinary course of business as if the Order had never issued; and

(4) Defendants are directed to take, in good faith, any other steps that are necessary to prevent the implementation or enforcement of the Order.

The grounds for this motion are set forth in the attached memorandum of law and its supporting declarations and exhibits.

April 8, 2025

Respectfully submitted,

/s/ Paul D. Clement

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