

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

DEMOCRATIC NATIONAL
COMMITTEE, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, *et al.*,

Defendants.

Civil Action No. 25-cv-0952 (CKK)

PLAINTIFFS' MOTION TO CONSOLIDATE

Plaintiffs in this action—the Democratic National Committee, the Democratic Governors Association, the Democratic Senatorial Campaign Committee, the Democratic Congressional Campaign Committee, and the Democratic leaders of the U.S. Senate and House, Charles E. “Chuck” Schumer and Hakeem S. Jeffries, respectively (“Democratic Party Plaintiffs”)—move for consolidation of *Democratic National Committee et al. v. Trump et al.*, No. 1:25-cv-00952, *League of United Latin American Citizens et al. v. Executive Office of the President et al.*, No. 1:25-cv-00946, and *League of Women Voters Education Fund et al. v. Trump et al.*, No. 1:25-cv-00955. *See* Fed. R. Civ. P. 42(a)(2); LCvR 40.5(d).

On April 1, 2025, the clerk of Court randomly assigned this matter, *Democratic National Committee et al. v. Trump et al.*, No. 1:25-cv-00952, to the Honorable Colleen Kollar-Kotelly. *See* ECF No. 15. “Two other matters, *League of United Latin American Citizens v. Executive Office of the President*, No. 25-cv-0946, and *League of Women Voters Education Fund v. Trump*, No. 25-cv-0955, were later assigned to this Court as ‘related case[s]’ pursuant to Local Rule of Civil Procedure 40.5(c).” *Id.* at 1. The Court ordered Democratic Party Plaintiffs in this case to “file

either a motion to consolidate or a brief memorandum, not to exceed five pages, explaining why the parties believe that consolidation is not warranted.” *Id.* at 2 (citing Fed. R. Civ. P. 42(a)(2); LCvR 40.5(d)).

On April 2, 2025, in accordance with the Court’s April 1 order, *see* ECF No. 15, counsel for the Democratic Party Plaintiffs met and conferred with the parties in the related cases, including counsel for all governmental Defendants sued in each of the three cases, and Plaintiffs’ counsel in both *League of United Latin American Citizens et al. v. Executive Office of the President et al.*, No. 1:25-cv-00946, and *League of Women Voters Education Fund et al. v. Trump et al.*, No. 1:25-cv-00955.

All parties agreed that consolidation is appropriate under Federal Rule of Civil Procedure 42(a)(2) for reasons identified by the Court, *see* ECF No. 15, including because there are “extensive common questions of law and fact” among the cases, and consolidation will “promote the interests of judicial economy, consistency, timeliness and convenience, without being likely to trigger any substantial risk of inconvenience, prejudice, delay or expense for the Court or the litigants.” *Nat’l Ass’n of Mortg. Brokers v. Bd. of Governors of Fed. Rsrv. Sys.*, 770 F. Supp. 2d 283, 287 (D.D.C. 2011).

All parties further agreed that the separately represented Plaintiffs in the three cases reserve the right to file their own pleadings, motions, and briefs in the consolidated cases, and that the governmental Defendants reserve the same rights for separate briefing with respect to each of the three consolidated cases.

CONCLUSION

The Democratic Party Plaintiffs request that the Court grant their motion to consolidate.

Dated: April 2, 2025

Respectfully submitted,

/s/ Marc Elias

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**Pro hac vice application pending*