

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

PERKINS COIE LLP,

*Plaintiff,*

v.

U.S. DEPARTMENT OF JUSTICE, *et al.*,

*Defendants.*

Case No. 1:25-cv-00716 (BAH)

Judge Beryl A. Howell

**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT  
AND DECLARATORY AND PERMANENT INJUNCTIVE RELIEF**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Perkins Coie LLP, by undersigned counsel, respectfully moves for summary judgment against all Defendants on all claims. Plaintiff respectfully requests this Court declare that Executive Order 14230, entitled “Addressing Risks from Perkins Coie LLP,” 90 Fed. Reg. 11781, issued by the President on March 6, 2025, and published on March 11, 2025, is unlawful because it violates the First, Fifth, and Sixth Amendments to the U.S. Constitution, exceeds the President’s constitutional authority under Article II, and violates the separation of powers. Plaintiff further respectfully requests this Court permanently enjoin Defendants from implementing or enforcing Executive Order 14230 in any way and grant the related relief described in the attached proposed order.

Pursuant to the Court’s Order on streamlined procedures (ECF 175), the grounds for this motion are set forth in Plaintiff’s previously filed Memorandum of Law in Support of Plaintiff’s Motion for Summary Judgment and Declaratory and Permanent Injunctive Relief and supporting statement of material facts, declarations, expert reports and exhibits (ECF 39-1 to 39-8); its previously filed Reply Memorandum in Support of Plaintiff’s Motion for Summary Judgment and Declaratory and Permanent Injunctive Relief and supporting reply declaration and exhibits (ECF

148 & 148-1); and the arguments of its counsel during the prior motions hearing on April 23, 2025 (ECF 169; 4/23/2025 Tr.). A proposed order describing with more particularity the relief sought is attached hereto.

Dated: April 30, 2025

Respectfully submitted,

**WILLIAMS & CONNOLLY LLP**

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