

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

SUSMAN GODFREY LLP,

Plaintiff,

v.

EXECUTIVE OFFICE OF THE
PRESIDENT, *et al.*,

Defendants.

Civil Case No.: 1:25-cv-01107
Judge Loren L. AliKhan

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

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Susman Godfrey LLP, by undersigned counsel, respectfully moves for summary judgment against Defendants on all claims. Plaintiff respectfully requests this Court declare that Executive Order 14263, entitled “Addressing Risks from Susman Godfrey,” 90 Fed. Reg. 15615, issued by the President on April 9, 2025, and published on April 15, 2025, is unlawful because it violates the First and Fifth 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 14263 in any way and grant the related relief described in the attached proposed order.

Pursuant to the Court’s Order adopting streamlined procedures (ECF No. 176), the grounds for this motion are set forth in Susman’s previously filed Memorandum of Points and Authorities in Support of Plaintiff’s Motion for Summary Judgment, supporting statement of undisputed material facts, declarations, and exhibits (ECF Nos. 51-1 through 51-70); Susman’s previously

filed Reply Memorandum in Support of Plaintiff's Motion for Summary Judgment (ECF No. 164); and the arguments of counsel during the motions hearing on May 8, 2025 (ECF No. 177). A proposed order describing with more particularity the relief sought is attached hereto.

Dated: May 12, 2025

Respectfully submitted,

/s/ Donald B. Verrilli, Jr.

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