UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

BARBARA J. LEE et al.,

Plaintiffs,

v.

DONALD J. TRUMP et al.,

Defendants.

Case No. 21-cv-00400 (APM)

Consolidated Cases:

21-cv-00586 (APM)

21-cv-00858 (APM)

21-cv-02265 (APM)

22-cv-00010 (APM)

22-cv-00011 (APM)

22-cv-00034 (APM)

23-cv-00038 (APM)

PRESIDENT DONALD J. TRUMP'S MOTION FOR SUMMARY JUDGMENT

Defendant President Donald J. Trump moves this Court for summary judgment based on the doctrine of absolute presidential immunity.

In support of this motion, President Trump submits the accompanying memorandum, which is fully incorporated herein. For these foregoing reasons, as well as those contained in the accompanying memorandum, Defendant President Trump moves that the Court grant his motion.

January 24, 2025

Respectfully submitted,

/s/ Jonathan M. Shaw

Jonathan M. Shaw

D.C. Bar No. 446249

Gerald A. Urbanek, Jr.

VA Bar No. 95043

DHILLON LAW GROUP, INC.

2121 Eisenhower Ave, Suite 402

Alexandria, Virginia 22314

Telephone: (703) 574-1206

Facsimile: (415) 520-6593

jshaw@dhillonlaw.com

gurbanek@dhillonlaw.com

Jesse R. Binnall, VA022 BINNALL LAW GROUP, PLLC 717 King Street, Suite 200 Alexandria, Virginia 22314 Telephone: (703) 888-1943 Facsimile: (703) 888-1930 jesse@binnall.com

Scott Gessler*
GESSLER BLUE LAW
7350 E. Progress Place, Suite 100
Greenwood Village, Colorado 80111
Telephone: (720) 839-6637
sgessler@gesslerblue.com

Attorneys for Defendant President Donald J. Trump

^{*} pro hac vice forthcoming

CERTIFICATE OF SERVICE

I certify that on January 24, 2025, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Jonathan M. Shaw Jonathan M. Shaw D.C. Bar No. 446249

Attorney for Defendant President Donald J. Trump