

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

PROTECT DEMOCRACY PROJECT,

Plaintiff,

v.

U.S. OFFICE OF MANAGEMENT & BUDGET
et al.,

Defendants.

Case No. 1:25-cv-01111

**PLAINTIFF’S MOTION FOR EXPEDITED SUMMARY JUDGMENT, OR IN THE
ALTERNATIVE A PRELIMINARY INJUNCTION OR A WRIT OF MANDAMUS**

For the reasons explained in the attached Memorandum of Law, Plaintiff Protect Democracy Project hereby moves for expedited summary judgment under Federal Rule of Civil Procedure 56. Should the Court conclude that expedited summary judgment cannot be entered, Plaintiff moves for a preliminary injunction under Federal Rule of Civil Procedure 65. Finally, should the Court determine that it cannot grant summary judgment or a preliminary injunction, Protect Democracy respectfully requests that the Court issue a writ of mandamus.

Dated: April 22, 2025

/s/ Daniel F. Jacobson

Daniel F. Jacobson (D.C. Bar # 1016621)

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(admitted *pro hac vice*)

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2025, I served the foregoing Motion for Expedited Summary Judgment or in the Alternative a Preliminary Injunction or a Writ of Mandamus, and all supporting documents, on Defendants' counsel via the Court's ECF filing system.

/s/ Daniel F. Jacobson
Daniel F. Jacobson