

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

DOE 1, DOE 2, and DOE, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION, et al.

Defendants.

Case No. 1:25-cv-01124

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Plaintiffs respectfully move under Federal Rule of Civil Procedure 56 for an order granting summary judgment in their favor. As set forth in detail in the accompanying Memorandum, the undisputed material facts demonstrate that Defendants Andrea Lucas and Equal Employment Opportunity Commission conducted an *ultra vires* investigation of twenty law firms, in violation of Title VII of the Civil Rights Act of 1964. Without the filing of a Title VII charge, as Title VII requires, Defendants sent letters to the law firms dated March 17, 2025 that sought personal sensitive personal information about their employees and applicants, including their name, sex, race, contact information, academic performance, and compensation. Plaintiffs are among those whose confidential information would be disclosed as a result of the sending of the letters, and whose harm would be redressed by a declaration stating that the *ultra vires* investigation violates Title VII and an order halting *ultra vires* investigations of law firms and requiring Defendants to retract the letters and destroy any information they have obtained.

This Motion is based on this document, and: Plaintiffs' Memorandum in Support, Plaintiffs' Statement of Undisputed Material Facts, and a Proposed Order, all of which are submitted here; all documents filed by Plaintiffs in this case to date, including the Declaration of Orlando Economos, ECF No. 25-4, and Declarations of Does 1, 2, and 3, ECF Nos. 25-5, 25-6, 25-7; and any further documents and argument submitted in support of the Motion.

Dated: June 5, 2025

Respectfully submitted,

/s/ Jennifer Fountain Connolly

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