IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

NATIONAL TREASURY EMPLOYEES UNION 800 K Street N.W., Suite 1000 Washington, D.C. 20001,

Plaintiff,

v.

DONALD J. TRUMP, President of the United States 1600 Pennsylvania Avenue N.W. Washington, D.C. 20500, et al.,

Defendants.

Case No. 1:25-cv-00935 (PLF)

PLAINTIFF NTEU'S MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff National Treasury Employees Union (NTEU) moves for summary judgment.

NTEU challenges Executive Order No. 14,251, Exclusions from Labor-Management Relations Programs, Section 2, which strips collective-bargaining rights from hundreds of thousands of federal employees across the government.

That Order is contrary to the Federal Sector Labor-Management Relations Statute and is thus ultra vires. It also reflects retaliation for protected speech in violation of the First Amendment. There are no material facts in dispute.

For these reasons and the reasons set forth in the accompanying memorandum, NTEU requests that summary judgment be issued in its favor.

Respectfully submitted,

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/s/ Paras N. Shah
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/s/ Allison C. Giles ALLISON C. GILES Assistant Counsel D.C. Bar 439705

/s/ Jessica Horne JESSICA HORNE Assistant Counsel D.C. Bar 1029732

/s/ Kathryn W. Bailey KATHRYN W. BAILEY Assistant Counsel D.C. Bar 1643256

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