

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN FEDERATION OF
TEACHERS, AFL-CIO; UNITED
FEDERATION OF TEACHERS; SERVICE
EMPLOYEES INTERNATIONAL UNION,
AFL-CIO; SEIU HEALTHCARE
MINNESOTA & IOWA; SEIU
COMMITTEE OF INTERNS AND
RESIDENTS; UNITED FOOD AND
COMMERCIAL WORKERS
INTERNATIONAL UNION, AFL-CIO;
UFCW LOCAL 135; UFCW LOCAL 2013;
INTERNATIONAL ASSOCIATION OF
MACHINISTS AND AEROSPACE
WORKERS, AFL-CIO; IAM DISTRICT
160; AMERICAN FEDERATION OF
STATE, COUNTY & MUNICIPAL
EMPLOYEES, AFL-CIO; AFSCME
COUNCIL 31; UNITED NURSES
ASSOCIATIONS OF CALIFORNIA/UNION
OF HEALTH CARE PROFESSIONALS;
AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO
and AMERICAN FEDERATION OF
LABOR AND CONGRESS OF
INDUSTRIAL ORGANIZATIONS,

PLAINTIFFS,

v.

GREGORY GOLDSTEIN, in his official
capacity as Acting Director of the Federal
Mediation and Conciliation Service;
FEDERAL MEDIATION AND
CONCILIATION SERVICE; UNITED
STATES OF AMERICA; UNITED STATES
OFFICE OF MANAGEMENT AND
BUDGET; and RUSSELL T. VOUGHT, in
his official capacity as the Director of the
Office of Management and Budget,

DEFENDANTS.

Case No. 1:25-cv-03072-AS

**PLAINTIFFS' NOTICE OF MOTION
AND MOTION FOR SUMMARY
JUDGMENT**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE THAT on a date and time to be set by the Court, in Courtroom 15A of the Daniel Patrick Moynihan United States Courthouse located at 500 Pearl Street, New York, NY 10007-1312, Plaintiffs will and hereby do move the Court pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment against Defendants on all counts of the operative complaint.

This Motion is based on this Notice of Motion, the accompanying Memorandum of Law, the accompanying Supplemental Declarations of Joe Guzynski, David DiMaria, Jill Pitman, and the Declaration of Scott DiMauro; the declarations already contained in the record set forth in the table below, including the exhibits attached thereto; the administrative record filed by Defendants (ECF No. 63); any reply memorandum or other memorandum Plaintiffs may file; all pleadings and filings in this action; and such other filings and arguments as may be presented to the Court.

Declaration of Miles Trager	ECF No. 11
Declaration of Jamie Gulley	ECF No. 12
Declaration of David Dashefsky	ECF No. 13
Declaration of Bruce Todd Walters	ECF No. 14
Declaration of Paul Shepherd	ECF No. 15
Declaration of Brandon Hemming	ECF No. 16
Declaration of Dalia Thornton	ECF No. 17
Declaration of Joe Guzynski	ECF No. 18
Declaration of Amelia Glymph	ECF No. 19
Declaration of Maneesh Sharma	ECF No. 20
Declaration of Javier Ramirez	ECF No. 21
Declaration of Joseph Kelleher	ECF No. 22
Supplemental Declaration of Bruce Todd Walters	ECF No. 32
Declaration of David DiMaria	ECF No. 33

Declaration of Rick Dahn	ECF No. 34
Declaration of Jill Pitman	ECF No. 35
Supplemental Declaration of Miles Trager	ECF No. 38

Dated: June 13, 2025

/s/ Elisabeth Oppenheimer

Elisabeth Oppenheimer*

(Lead Trial Counsel)

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