

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

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES,

Plaintiff,

v.

U.S. DEPARTMENT OF EDUCATION and
LINDA MCMAHON, in her official capacity as
Secretary of Education,

Defendants.

Civil Action No. 25-cv-3553

PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT

Plaintiff American Federation of Government Employees moves under Federal Rule of Civil Procedure 56 for summary judgment. In support of this motion, Plaintiff submits the accompanying memorandum of law, statement of undisputed material facts, the declarations and exhibits listed in the attached index, and a proposed order.

Through a separate motion filed today, Plaintiff seeks an expedited briefing schedule on this motion.

Respectfully submitted,

Cormac Early (D.C. Bar No. 1033835)
Allison Zieve (D.C. Bar No. 424786)
PUBLIC CITIZEN LITIGATION GROUP
1600 20th Street NW
Washington, DC 20009
202-588-1000

/s/ Tsuki Hoshijima
Tsuki Hoshijima (MA Bar No. 693765)
Christine L. Coogle (D.C. Bar No. 1738913)
Jyoti Jasrasaria (D.C. Bar No. 1671527)
Robin F. Thurston (D.C. Bar No. 7268942)
Skye L. Perryman (D.C. Bar No. 984573)
DEMOCRACY FORWARD FOUNDATION
P.O. Box 34553
Washington, D.C. 20043
(202) 448-9090

Counsel for Plaintiff