

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

AMERICAN CIVIL LIBERTIES UNION,

Plaintiff,

v.

UNITED STATES SOCIAL SECURITY
ADMINISTRATION and UNITED STATES
DEPARTMENT OF VETERANS AFFAIRS,

Defendants.

Case No. 1:25-cv-01217

ORAL ARGUMENT REQUESTED

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65 and Local Rule 65.1(c), Plaintiff American Civil Liberties Union (“ACLU”) respectfully moves for a preliminary injunction in this Freedom of Information Act (“FOIA”), 5 U.S.C. § 552, suit against Defendant United States Social Security Administration (“SSA”).¹ The requested injunction would require Defendant SSA to immediately process Plaintiff’s FOIA request for records related to the United States DOGE Service’s access to federal government data systems. Pursuant to Local Civil Rule 65.1(d), Plaintiff requests that the Court order Defendant to file any opposition to this motion by no later than May 14, 2025, and schedule a hearing on this motion at the Court’s earliest convenience.

Pursuant to Local Civil Rule 7(m), Plaintiff’s counsel contacted the Civil Division Chief, Office of the United States Attorney for the District of Columbia, who indicated that Defendant SSA opposes this motion. Wessler Decl. ¶ 22.

¹ Plaintiff does not seek a preliminary injunction against Defendant U.S. Department of Veterans Affairs, which began producing responsive records after Plaintiff filed suit. *See* Wessler Decl. ¶ 21.

Plaintiff submits the attached Memorandum of Points and Authorities, the Declaration of Nathan Freed Wessler, and a proposed order in support of this motion.

Dated: May 7, 2025

Respectfully submitted,

/s/ Megan C. Keenan

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Counsel for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that following electronic filing of this motion and attachments, counsel will cause service to be effected on Defendants by sending a copy of this motion and the attached Memorandum of Points and Authorities, the Declaration of Nathan Freed Wessler, and the proposed order to the United States Attorney via email as directed on the website of the U.S. Attorney for the District of Columbia, and via Priority Mail to the service addresses of the U.S. Attorney General and Defendants U.S. Social Security Administration and U.S. Department of Veterans Affairs.

Dated: May 7, 2025

/s/ Megan C. Keenan

Megan C. Keenan