

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LEAGUE OF WOMEN VOTERS, *et al.*,
Plaintiffs,
v.
U.S. DEPARTMENT OF HOMELAND
SECURITY, *et al.*,
Defendants.

Case No. 25-cv-3501-SLS

**NOTICE OF WITHDRAWAL OF PLAINTIFFS J. DOE 1, J. DOE 4, AND J. DOE 5'S
MOTION FOR CERTIFICATION OF PRELIMINARY RELIEF SUBCLASS**

Plaintiffs J. Does 1, 4, and 5 hereby withdraw their Motion for Certification of Preliminary Relief Subclass. *See* ECF 17.

The primary argument of the Plaintiffs moving for preliminary relief (the League of Women Voters, League of Women Voters of Virginia, League of Women Voters of Louisiana, League of Women Voters of Louisiana Education Fund, and J. Does 1, 4, and 5) is that the Court should grant them preliminary relief under § 705 of the Administrative Procedure Act (“APA”), which authorizes the Court to stay already-effective agency action (here, the overhaul of the SAVE system) wholesale, not in a way that is limited to the plaintiffs before the Court, pending final resolution of the case. Plaintiffs sought class certification solely in the alternative and to the extent that the Court concluded it could not grant the full scope of the moving Plaintiffs’ requested relief under § 705. *Id.* at 2 n.3; *see also* Mot. for a Stay under § 705, ECF 16, at 2 n.2.

It remains Plaintiffs’ position that the Court may grant the full scope of Plaintiffs’ requested relief under § 705 of the APA without certifying a class. Thus, to facilitate efficient resolution of this matter, Plaintiffs J. Does 1, 4, and 5 withdraw their Motion for Certification of Preliminary Relief Subclass, ECF 17.

Dated: October 29, 2025

/s/ Nikhel S. Sus

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