

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND,

Plaintiff,

v.

TODD M. LYONS, Senior Official  
Performing the Duties of the Director, U.S.  
Immigration and Customs Enforcement;  
UNITED STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT;  
MARKWAYNE MULLIN,<sup>1</sup> Secretary, U.S.  
Department of Homeland Security; and  
UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY,

Defendants.

Civ. No. 1:26-cv-01024-JRR

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**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

For reasons explained in greater detail in the accompanying memorandum of law, Plaintiff States move for summary judgment against all Defendants,

1. Declaring that Defendants' denial of Plaintiff's administrative subpoena and *Touhy* request was contrary to law and/or arbitrary and capricious under the Administrative Procedure Act, 5 U.S.C. § 706(2)(A), (D), or, in the alternative, that Defendants' response to Plaintiff's administrative subpoena and *Touhy* request has been unreasonably delayed, *id.* § 706(1);
2. Vacating Defendants' denial of Plaintiff's administrative subpoena and *Touhy* request; and
3. Ordering Defendants to produce the documents requested.

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<sup>1</sup> Pursuant to Federal Rule of Civil Procedure 25(d), Markwayne Mullin is substituted for Kristi Noem as Secretary of Homeland Security.

Dated: March 26, 2026

Respectfully submitted,

**ANTHONY G. BROWN**  
ATTORNEY GENERAL OF MARYLAND

By: /s/ Keith M. Jamieson  
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**CERTIFICATE OF SERVICE**

I certify that on March 26, 2026, I electronically filed the foregoing document and its attachments via CM/ECF and thereby served all parties who have appeared through counsel on the Court's electronic docket.

Respectfully submitted,

By: */s/ Keith M. Jamieson*

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