

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

JOYCE BEATTY,

Plaintiff,

v.

Civil Action No. 25-4480 (CRC)

DONALD J. TRUMP, in his capacity as trustee
of the John F. Kennedy Center for the
Performing Arts, 2700 F Street NW
Washington, DC 20566;

MATTHEW FLOCA,¹ in his capacity as
Executive Director and Chief Operating Officer
of the John F. Kennedy Center for the
Performing Arts, 2700 F Street NW
Washington, DC 20566;

JENNIFER FISCHER, in her capacity as trustee
of the John F. Kennedy Center for the
Performing Arts, 2700 F Street NW
Washington, DC 20566;

SERGIO GOR, in his capacity as trustee of the
John F. Kennedy Center for the Performing Arts,
2700 F Street NW
Washington, DC 20566;

JOHN FALCONETTI, in his capacity as trustee
of the John F. Kennedy Center for the
Performing Arts, 2700 F Street NW
Washington, DC 20566;

BRIAN D. BALLARD, in his capacity as trustee
of the John F. Kennedy Center for the
Performing Arts, 2700 F Street NW
Washington, DC 20566;

¹ Plaintiff's amended complaint names as a Defendant Richard Grenell in his official capacity as then-President of the John F. Kennedy Center. Under Federal Rule of Civil Procedure 25(d), Matthew Floca, current Executive Director and Chief Operating Officer of the Center, now the seniormost executive officer of the Center, is automatically substituted as a Defendant.

MARIA BARTIROMO, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

PAMELA BONDI, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

MARY HELEN BOWERS, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

HANNAH F. BUCHAN, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

ROBERT CASTELLANI, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

ELAINE CHAO, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

PAMELLA ROLAND DEVOS, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

PATRICIA DUGGAN, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

EMILIA MAY FANJUL, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW Washington, DC 20566;

LYNETTE FRIESS, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

PAMELA GROSS, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

LEE GREENWOOD, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

KATE ADAMSON HASELWOOD, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

LAURA INGRAHAM, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

MICHELE KESSLER, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

DANA KRAFT, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

MINDY LEVINE, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

LYNDA LOMANGINO, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

BARBARA LONG, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

ALLISON LUTNICK, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

DOUGLAS MANCHESTER, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

CATHERINE B. REYNOLDS, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

DENISE SAUL, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

DAN SCAVINO, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

CHERI SUMMERALL, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

USHA VANCE, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

SUSIE WILES, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

ANDREA WYNN, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

PAOLO ZAMPOLLI, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

ROBERT F. KENNEDY, JR., in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

MARCO RUBIO, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

LINDA MCMAHON, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

MIKE JOHNSON, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

SAM GRAVES, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

JULIA LETLOW, in her capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

MIKE MCCAUL, in his capacity as trustee of the John F. Kennedy Center for the Performing Arts, 2700 F Street NW
Washington, DC 20566;

JOHN THUNE, in his capacity as trustee of the
John F. Kennedy Center for the Performing Arts,
2700 F Street NW
Washington, DC 20566;

SHELLEY MOORE CAPITO, in her capacity as
trustee of the John F. Kennedy Center for the
Performing Arts, 2700 F Street NW
Washington, DC 20566;

SUSAN COLLINS, in her capacity as trustee of
the John F. Kennedy Center for the Performing
Arts, 2700 F Street NW
Washington, DC 20566;

TRUSTEES OF THE JOHN F. KENNEDY
CENTER FOR THE PERFORMING ARTS,
2700 F Street NW,
Washington, DC 20566; and

JOHN F. KENNEDY CENTER FOR THE
PERFORMING ARTS,
2700 F Street NW
Washington, DC 20566,

Defendants.

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Rule 56(a) of the Federal Rules of Civil Procedure, Defendants respectfully
move for summary judgment on all claims raised in Plaintiff's amended complaint, ECF No. 12.

A memorandum of law in support and a proposed order are filed as attachments to this motion.

Dated: April 6, 2026

Respectfully submitted,

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Assistant Attorney General, Civil Division

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Principal Deputy Assistant Attorney General

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STEPHEN M. ELLIOTT
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/s/ William S. Jankowski

WILLIAM S. JANKOWSKI

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, William S. Jankowski, hereby certify that on April 6, 2026, I electronically filed the foregoing, and all its attachments, using the Court's CM/ECF system, which automatically serves this document upon all counsel of record, in keeping with LCvR 5.4(d).

/s/ William S. Jankowski

William S. Jankowski

Counsel for Defendants