

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIAM FRANCIS GALVIN, in his official capacity as Secretary of the Commonwealth of Massachusetts,

Defendant.

Case No. 25-cv-13816
(Hon. Leo T. Sorokin)

**ORAL ARGUMENT
REQUESTED**

**MOTION TO DISMISS THE COMPLAINT
BY COMMON CAUSE, JANE DOE INC., AND JUAN PABLO JARAMILLO**

Common Cause, Jane Doe Inc., and Juan Pablo Jaramillo (collectively, the “Common Cause Intervenors”) respectfully move to dismiss the Complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure. The Common Cause Intervenors respectfully request a hearing on their motion to aid the Court in the disposition of the important issues at stake.

As set forth more fully in the memorandum of law filed concurrently with this motion, the requests propounded by the U.S. Department of Justice (“DOJ”) on the Commonwealth of Massachusetts, as set forth in the Complaint, do not satisfy the core statutory requirement that any federal demand for information under the Civil Rights Act of 1960 (“CRA”) must include a disclosure of “the basis and the purpose” for the federal data request. 52 U.S.C. § 20703. Because the United States failed to disclose the basis and the purpose of its request for millions of Massachusetts voters’ sensitive personal data, and also because the United States’s request for unredacted personal information is in conflict with federal and state privacy protections and

procedures, the United States has failed to state a claim under the CRA for which relief can be granted. This Court should dismiss this action.

A declaration supporting the motion is filed concurrently herewith, with exhibits attached.

The Common Cause Intervenors have conferred with Plaintiff the United States. The United States opposes the motion.

CONCLUSION

The Court should grant the Motion to Dismiss and dismiss the Complaint.

Dated: February 6, 2026

Respectfully submitted,

/s/ Ari Savitzky

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2026, a true and correct copy of the foregoing document was filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record.

/s/ Ari Savitzky

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1, counsel for the Common Cause Intervenors have conferred with counsel for the parties regarding this Motion. The United States opposes the Motion.

/s/ Ari Savitzky