

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

LEAGUE OF WOMEN VOTERS OF  
MASSACHUSETTS, *et al.*,

*Plaintiffs,*

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

*Defendants.*

Case No. 1:26-cv-11549-IT

**NOTICE OF FACTUAL DEVELOPMENTS RELEVANT TO  
PLAINTIFFS' PENDING MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs respectfully submit this notice to inform the Court of a whistleblower disclosure regarding USPS's implementation of President Trump's Executive Order No. 14399, "Ensuring Citizenship Verification and Integrity in Federal Elections," (Executive Order). Attached to this filing as **Exhibit A** are both correspondence from United States Senator Richard Blumentahl sent to Postmaster General David Steiner regarding the whistleblower disclosure, as well as the whistleblower disclosure itself.

Plaintiffs submit this notice because the whistleblower disclosure supports Plaintiffs' arguments in support of their motion for preliminary injunction regarding standing (Dkt. 250 at 1-4), and irreparable harm and the balance of equities (Dkt. 207 at 13-18; Dkt. 250 at 8-10), including the likelihood of mass rejection of batches of mail ballots based on technological errors and/or minor, and inevitable, errors in data. *See* Disclosure at 1-2 (noting "[a]s presently designed, if even one bar code on one single ballot in a bulk-mailing of 10,000 ballots fails to properly scan during the verification process, the entire batch is rejected and sent back to the state – effectively stopping the ballots from being mailed to voters."); *id.* at 10-11 ("The new scanning verification process is

designed so that after a *single* failed bar code verification, USPS will stop scanning and refuse to accept the entire batch of ballots . . . .It could delay ballots by the thousands in repeated verification cycles – and thus prevent states from mailing enormous numbers of ballots.”).

Dated: September 1, 2026

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2026 true copy of the above document was filed via the Court's CM/ECF system and that a copy will be sent automatically to all counsel of record.

September 1, 2026

/s/Suzanne Schlossberg  
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