

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

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiffs League of Women Voters of Massachusetts, League of Women Voters Lotte E. Scharfman Memorial Education Fund, League of Women Voters of the United States, League of Women Voters Education Fund, Association of Americans Resident Overseas, U.S. Vote Foundation, OCA-Asian Pacific American Advocates, and Delta Sigma Theta Sorority, Inc. respectfully move for a preliminary injunction on Counts I and II of their Complaint against Defendants United States Postal Service (USPS), USPS Board of Governors, Amber F. McReynolds (in her official capacity as Chair of the Board of Governors of USPS), Derek T. Kan (in his official capacity as Vice Chairman of the Board of Governors of USPS), Ronald A. Stroman (in his official capacity as a Member of the Board of Governors of USPS), Daniel M. Tangherlini (in his official capacity as a Member of the Board of Governors of USPS), and David P. Steiner (in his official capacity as United States Postmaster General) (collectively, the USPS Defendants).

Specifically, Plaintiffs respectfully ask this Court to preliminarily enjoin the USPS Defendants from implementing or giving effect to Section 3 of President Trump's Executive Order

No. 14399 (Executive Order), including not delivering ballots to or from voters who are not on the USPS Mail-In and Absentee Participation Lists, the Department of Homeland Security State Citizenship Lists, or any other federally-created list, and any other portion of the Executive Order in which the President issues commands to USPS, because the President lacks any authority, inherent or delegated, to regulate federal elections or the mail, and because such commands are ultra vires because they direct USPS to violate federal law or to act in a manner not authorized by statute.

As set forth in the accompanying Memorandum in Support of Plaintiffs' Motion for Preliminary Injunction, Plaintiffs are entitled to a preliminary injunction because they are likely to succeed on the merits of their claims, they are suffering and will continue to suffer irreparable injuries in the absence of the requested relief both as organizations and on behalf of their members, the balance of the equities support an injunction, and the issuance of the injunction is in the public interest.

The grounds for this Motion are fully set forth in the accompanying Memorandum in Support, and a Proposed Order is attached.

### **REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Plaintiffs respectfully request oral argument on their Motion. As described more fully in Plaintiffs' Memorandum in Support, the Executive Order is an unprecedented and unlawful assertion of presidential power over election administration signed on the eve of primary and general midterm elections. Absent an injunction, the Executive Order will disrupt the mail voting process, which is relied on by millions of U.S. citizens, and cause Plaintiffs further irreparable harm.

Dated: April 23, 2026

Respectfully submitted,

Jessie J. Rossman (BBO #670685)  
Suzanne Schlossberg (BBO #703914)  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF MASSACHUSETTS,  
INC.  
One Center Plaza, Suite 850  
Boston, MA 02108  
(617) 482-3170  
jrossman@aclum.org  
sschlossberg@aclum.org

Eliza Sweren-Becker\*  
Wendy Weiser\*  
Andrew B. Garber\*  
BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
(646) 292-8310  
sweren-beckere@brennan.law.nyu.edu  
weiserw@brennan.law.nyu.edu  
garbera@brennan.law.nyu.edu

Justin Lam\*  
BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW  
777 6th St. NW, Ste. 1100  
Washington, DC 20001  
(202) 249-7190  
lamju@brennan.law.nyu.edu

Niyati Shah\*  
Noah Baron\*  
Ejaz Baluch, Jr.\*  
ASIAN AMERICANS ADVANCING  
JUSTICE-AAJC  
1620 L Street NW, Suite 1050  
Washington, DC 20036  
(202) 296-2300  
nshah@advancingjustice-aajc.org  
nbaron@advancingjustice-aajc.org  
ebaluch@advancingjustice-aajc.org

/s/ Sophia Lin Lakin  
Sophia Lin Lakin\*  
Theresa J. Lee\*  
Davin Rosborough\*  
Ethan Herenstein\*  
Jonathan Topaz\*  
Ming Cheung\*  
William Hughes\*  
Clayton Pierce\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad St., 18th Floor  
New York, NY 10004  
(212) 549-2500  
slakin@aclu.org  
tlee@aclu.org  
drosborough@aclu.org  
eherenstein@aclu.org  
jtopaz@aclu.org  
mcheung@aclu.org  
whughes@aclu.org  
cpierce@aclu.org

Sarah Brannon\*  
Adriel I. Cepeda Derieux\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
915 15th St. NW  
Washington, DC 20001  
(202) 457-0800  
sbrannon@aclu.org  
acepedaderieux@aclu.org

Leah C. Aden\*  
Brenda Wright\*  
John S. Cusick\*  
NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC.  
40 Rector Street, 5th Floor  
New York, NY 10006  
(212) 965-2200  
laden@naacpldf.org  
bwright@naacpldf.org  
jcusick@naacpldf.org

Miranda Galindo\*  
LATINO JUSTICE PRLDEF  
475 Riverside Drive, Suite 1901  
New York, NY 10115  
(212) 392-4752  
mgalindo@latinojustice.org

I. Sara Rohani\*  
NAACP LEGAL DEFENSE &  
EDUCATIONAL FUND, INC.  
700 14th Street N.W. Ste. 600  
Washington, DC 20005  
(202) 682-1300  
srohani@naacpldf.org

*\*Admitted pro hac vice*

*Counsel for Plaintiffs League of Women  
Voters of Massachusetts, League of Women  
Voters Lotte E. Scharfman Memorial  
Education Fund, League of Women Voters of  
the United States, League of Women Voters  
Education Fund, Association of Americans  
Resident Overseas, U.S. Vote Foundation,  
OCA-Asian Pacific American Advocates, and  
Delta Sigma Theta Sorority, Inc.*

### **LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(A)(2), I certify that counsel for Defendants was contacted regarding the subject of this motion, and that Defendants oppose the motion.

*/s/ Sophia Lin Lakin*  
Sophia Lin Lakin

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 23, 2026 a 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.

April 23, 2026

*/s/ Sophia Lin Lakin*  
Sophia Lin Lakin